

1 IN THE UNITED STATES DISTRICT COURT

2 DISTRICT OF UTAH

3 CENTRAL DIVISION

4  
5 UNITED STATES OF AMERICA, )

6 Plaintiff, )

7 vs. )

Case No. 2:16-CR-631DAK

8 AARON MICHAEL SHAMO, )

9 Defendant. )

10 \_\_\_\_\_ )

11  
12  
13 BEFORE THE HONORABLE DALE A. KIMBALL

14 -----

15 August 15, 2019

16  
17 Jury Trial

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A P P E A R A N C E S

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## I N D E X

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1 August 15, 2019

8:30 a.m.

2 P R O C E E D I N G S

3  
4 THE COURT: The jury is here. We'll get them and  
5 proceed.

6 (WHEREUPON, the jury enters the proceedings.)

7 THE COURT: Thank you, ladies and gentlemen of the  
8 jury, for being prompt. We appreciate your work.

9 You may call your next witness, Mr. Stejskal.

10 MR. STEJSKAL: Thank you, Your Honor.

11 The United States next calls Drew Crandall.

12 DREW WILSON CRANDALL

13 Having been duly sworn, was examined

14 and testified as follows:

15 THE WITNESS: Drew Wilson Crandall, D-r-e-w,  
16 W-i-l-s-o-n, C-r-a-n-d-a-l-l.

17 THE COURT: You may proceed.

18 MR. STEJSKAL: Thank you, Your Honor.

19 DIRECT EXAMINATION

20 BY MR. STEJSKAL

21 Q. Lean into that microphone the best you can so everyone  
22 can hear you. Pull it down or whatever is the most  
23 comfortable.

24 How old are you?

25 A. I am 33 years old.

1 Q. And where do you currently live?

2 A. I guess I would say Draper, Utah, but I am currently  
3 incarcerated in the Tooele County Detention Center.

4 Q. The jail there?

5 A. Yes.

6 Q. How long have you been in jail?

7 A. A little over 27 months.

8 Q. When were you arrested?

9 A. May 5th, 2017.

10 Q. Where were you arrested?

11 A. I was arrested at the Hawaii Honolulu International  
12 Airport.

13 Q. What were you arrested for?

14 A. Conspiracy to traffic drugs, specifically Fentanyl and  
15 Xanax and then also conspiracy to commit money laundering.

16 Q. Your involvement in this particular case is what you  
17 were arrested for?

18 A. Yes.

19 Q. Now, you had a pretrial detention hearing in Hawaii,  
20 correct?

21 A. Correct.

22 Q. And asked to be released?

23 A. Yes.

24 Q. With what result?

25 A. I was detained indefinitely.

1 Q. A judge there found you to be detained?

2 A. Yes.

3 Q. How did you get to Utah?

4 A. 20 something days later I was extradited to Utah. I  
5 spent a night in Nevada, Pahrump, and then was flown up to  
6 Salt Lake City.

7 Q. So we're clear, you didn't fight extradition, it just  
8 took you that long to get here?

9 A. Yep.

10 Q. When you got back here, you had another pretrial  
11 detention hearing before Judge Kimball, correct?

12 A. Correct.

13 Q. And with what result?

14 A. I was still detained awaiting trial.

15 Q. You were deemed a flight risk or risk of danger to the  
16 community?

17 A. Yes.

18 Q. It was the judge that decided that, not me or your  
19 attorney or anybody else, correct?

20 A. Yes.

21 Q. Is it your understanding that you will get credit for  
22 the time that you have served on any ultimate sentence that  
23 you receive as a result of this offense?

24 A. Yes.

25 Q. Let's start at the beginning, I guess. Do you know

1 Aaron Shamo?

2 A. Yes.

3 Q. How long have you known him?

4 A. Probably about 10 to 11 years.

5 Q. Where did you guys first meet?

6 A. We met in Provo. We had mutual friends that we would  
7 go skateboarding and long boarding with.

8 Q. Were you guys both going to school?

9 A. Yes. I believe at the time -- I was going to school,  
10 but I don't know if Aaron was specifically, but I think he  
11 was at Utah Valley University.

12 Q. And did you become roommates at some point?

13 A. Yeah, we did. About three to four years after we met  
14 we became roommates in a townhouse in Orem.

15 Q. What were you guys doing at that time?

16 A. We were both working at a company called  
17 Teleperformance. I was going to school and Aaron was just  
18 working.

19 Q. After Teleperformance, where did you go next?

20 A. I moved to Salt Lake to continue my education at the  
21 University of Utah.

22 Q. Did you keep track of Mr. Shamo at that time?

23 A. Very rarely. I know that he stayed in the Orem area  
24 for another couple months and then moved back to his  
25 parents' house in Arizona.

1 Q. And then ultimately did you guys get back together at  
2 some future date?

3 A. Yes. About two or three years later he moved back to  
4 Salt Lake and was living at a house on Laurelhurst Drive on  
5 the east side. I was living in a house on 9th East. My  
6 lease had finally expired and so I decided to move in with  
7 him.

8 Q. On Laurelhurst?

9 A. Yes.

10 Q. Approximately when was that, 2012, '13?

11 A. Early 2014.

12 Q. Okay. Let's talk about your employment at eBay.

13 A. Yep.

14 Q. When did you start there?

15 A. I started there in March of 2014 -- or April.

16 Q. Did Mr. Shamo work there as well?

17 A. He did. He started a little bit later than me. I  
18 referred him to the position and he started in about June of  
19 2014.

20 Q. How long did you guys work there?

21 A. I worked there 21 months. Mr. Shamo worked there about  
22 18 months.

23 Q. You guys quit right around the same time?

24 A. Yes.

25 Q. So you are roommates at the Laurelhurst residence for a



1 while. Were there seeds of starting a business at that time  
2 together?

3 A. Yes. When Aaron was in Arizona he told me about  
4 Bitcoin mining and introduced me to it and explained what  
5 Bitcoins were. I tried it out for a day or two and didn't  
6 get very far with my computer. When I moved into the  
7 Laurelhurst address, he was looking into purchasing a  
8 Bitcoin miner, and he wanted me to be partners with him in  
9 mining Bitcoins.

10 Q. Really basically can you tell us what that is?

11 A. Bitcoin mining is essentially being the backbone of the  
12 system. When someone makes a transaction in Bitcoins, you  
13 need a computer to verify it. There is a lot of heavy math  
14 involved with the encryption of it, and being a miner is the  
15 backbone of that. And then you get rewarded for mining by  
16 receiving bitcoins.

17 Q. You guys don't actually do the math. The computer does  
18 that?

19 A. No. It is all done on the computer and it is all  
20 programmed right into the machine.

21 Q. So how did you guys get started in that? Did you buy  
22 some kind of equipment?

23 A. Yeah. Aaron was researching online what he wanted to  
24 get. He approached me with a miner. I believe the  
25 manufacturer was K. & C. It was \$6,000 and he asked me to

1 put in half. I explained to him that I didn't have that  
2 much money. I was only able to put in 1,000. He got our  
3 other roommate, David, to invest additional funds and then  
4 Aaron made up the rest.

5 Q. What did you say that cost approximately?

6 A. Approximately \$6,000.

7 Q. So the three of you invested in the bitcoin miner?

8 A. Yes.

9 Q. By miner we're just talking about that computer  
10 equipment that does what you said?

11 A. Yes. It is just a big piece of computer equipment that  
12 you plug into the wall and you plug into an ethernet and  
13 plug into the internet and you set it up once and it just  
14 runs.

15 Q. How do you guys get paid for that?

16 A. As you mine bitcoins on the network, you are part of  
17 that backbone of the network and they keep track of how much  
18 of work you put in and how much of a percentage you add to  
19 the total network capacity and they reward you Bitcoins for  
20 that.

21 Q. Talk about a Bitcoin wallet. How does that money come  
22 in and so you can actually access it?

23 A. Anytime that you receive Bitcoins you have to have an  
24 address that you are receiving it at. So the wallets are  
25 created and periodically Bitcoins are deposited into that

1 wallet.

2 Q. Who set up these Bitcoin wallets for your Bitcoin  
3 mining operation?

4 A. Aaron did. He set up the whole miner and he set up the  
5 wallets and everything.

6 Q. Who controlled the money, then, that came into the --

7 A. Aaron did.

8 Q. Did you ultimately get some money paid out of that?

9 A. I did.

10 Q. How much?

11 A. Roughly five or \$600.

12 Q. That happened at Laurelhurst and then did you guys move  
13 sometime later in 2014?

14 A. Yes. Later in -- it was actually early 2015.

15 Q. Where did you guys move?

16 A. We moved to a house on 1700 East in Salt Lake just  
17 south of 2100 South.

18 Q. Near Highland High School?

19 A. Yes.

20 Q. While at that address did you or Mr. Shamo do research  
21 on Google about the dark web?

22 A. I didn't specifically and I didn't know for sure if  
23 Aaron was doing research but, you know, he had used the dark  
24 web and he was familiar with it.

25 Q. Were you?

1 A. Just in a general sense. I knew what it was, but I had  
2 never actually logged on to the websites or anything or  
3 downloaded the T.O.R. browser.

4 Q. Did there come some discussion between you and Mr.  
5 Shamo about that?

6 A. Yes.

7 Q. Tell us about that.

8 A. In the early part of 2015 Aaron and I were both  
9 receiving Adderall prescriptions. I was very strapped for  
10 money and having issues paying my bills. So he approached  
11 me and mentioned that he would like to start selling our  
12 Adderall prescriptions online through the dark web and using  
13 that money to pay bills and just have a little extra money  
14 each month.

15 Q. When you say he there, who are you talking about?

16 A. Aaron.

17 Q. You guys were roommates at that time?

18 A. Yes.

19 Q. Did you or Mr. Shamo buy some things off the dark net?

20 A. Yes. At the time when we lived at Laurelhurst Drive,  
21 Aaron was buying G.H.B.

22 Q. What is that?

23 A. It is a depressant. It is generally referred to as a  
24 date rape drug. It makes you feel drunk and is work we  
25 nervous system depressant.

1 Q. Were you buying that or using that at that time?

2 A. No.

3 Q. So tell me more about selling Adderall prescriptions on  
4 the dark web. How did that work? Who set that up and how  
5 did that work?

6 A. So I would just give Aaron part of my prescription each  
7 month, just the portion that I felt like I could part with,  
8 because I was taking it for work and for school and stuff.

9 So he set up the accounts and set up the vendor account and  
10 everything. We needed to make an original deposit to set up  
11 that account, and so we used some of the bitcoins from our  
12 miner that we purchased to then make that initial deposit to  
13 set up that account, but it was all Aaron that set up the  
14 account. I never even had access to it, never knew the user  
15 name or the password.

16 Q. But you knew what he was doing?

17 A. Yes.

18 Q. So presumably then there were customers that would  
19 order this Adderall?

20 A. Yes.

21 Q. How did it get to them?

22 A. The Adderall would be packaged and then dropped off at  
23 the post office. And part of our agreement with setting  
24 this up and doing this is I would give up some of my  
25 Adderall prescription and I would take care of the shipping.

1 Aaron would come to me each night with a list of people that  
2 had made orders and he would come to me with a lockbox that  
3 he kept all of the prescription drugs in, and I would  
4 package them up in padded envelopes, write the addresses on  
5 them, put stamps on them, and then in the morning when we  
6 would drive to work, we would drop that off at the post  
7 office.

8 Q. You knew that that was illegal at that time, correct?

9 A. Correct.

10 Q. Why did you decide to do it?

11 A. I was having trouble paying my bills, keeping up with  
12 those each month, and I was just struggling financially. I  
13 had a lot of debt in student loans and I was just trying to  
14 keep me head above water.

15 Q. Tell us about the student loans.

16 A. I had about \$40,000 worth of student loans. I had been  
17 attending the University of Utah and dropped out. I had  
18 failed some classes and didn't achieve graduation and  
19 eventually those loans started coming due. So when those  
20 loans started coming due, I didn't have enough money each  
21 month to pay my bills and I started looking into other  
22 opportunities and ways to get a part-time job or make a  
23 little extra money and that is when Aaron approached me  
24 about selling our drugs online.

25 Q. You were both working at eBay at this time, correct?

1 A. Yes.

2 Q. In addition to yours and Mr. Shamo's Adderall  
3 prescriptions, was there somebody else's that you sold?

4 A. Yes. Aaron was purchasing other Adderall  
5 prescriptions, specifically from a mutual friend or ours,  
6 Mike Hanson.

7 Q. What was your involvement in that?

8 A. None. I never had any involvement. Aaron would go  
9 meet him and purchase it from him.

10 Q. Now, you said you had to make a deposit to set up an  
11 account or you guys had to -- Mr. Shamo did. There is a  
12 term Agora. Are you familiar with that term?

13 A. Yes.

14 Q. What is that?

15 A. That is the name of the marketplace that Aaron had set  
16 up the account to sell drugs on, similar to eBay or Amazon.  
17 Agora is just the name of the website.

18 Q. Do you know what the account was called at that time?

19 A. The account was jean001.

20 Q. Is that just kind of a made-up name?

21 A. Yeah. Aaron came up with that name. I don't know  
22 where that came from.

23 Q. And here we're talking like the summer of 2014?

24 A. Summer of 2015. This was about May and June of 2015.

25 No. 2014. I am sorry. You are right. This is May or

1 June of 2014.

2 Q. And you guys are living by Highland High School there  
3 at 1700 South?

4 A. Yes.

5 Q. Was there an agreement between you and Mr. Shamo as to  
6 this account that you now set up to sell Adderall?

7 A. Yes.

8 Q. What was the agreement?

9 A. Originally when we purchased the Bitcoin miner, the  
10 agreement was I would receive one-sixth and Aaron and David  
11 would split the other five-sixths. When Aaron and I decided  
12 to start selling Adderall, the agreement was that I would  
13 receive one-third of all of the profits and Aaron would  
14 receive two-thirds.

15 Q. What was your initial investment, then, in setting up  
16 that account to do that?

17 A. Just whatever Bitcoins were left over from the miner.  
18 The original deposit was around \$1,000, but I never had  
19 access to those wallets, so I didn't know exactly what was  
20 in there and how much -- how many Bitcoins that Aaron had  
21 used for my portion of it to start this account.

22 Q. Was there a written agreement between you guys?

23 A. No.

24 Q. Just a conversation and kind of a handshake?

25 A. Yep. Aaron and I at the time were roommates and



1 friends so we just kind of relied on that as a verbal  
2 contract, just, you know, I'll take one-third and you take  
3 two-thirds and that was the extent of it.

4 Q. You began selling Adderall. Did you and Mr. Shamo  
5 ultimately add more to your items for sale?

6 A. Yes.

7 Q. What did you add?

8 A. Initially we started adding G.H.B.

9 Q. You described what that was.

10 A. Yes.

11 Q. Anything else?

12 A. After that Aaron purchased Modafinil from someone else,  
13 and then we started buying M.D.M.A. and adding that and  
14 eventually L.S.D. and various other drugs, marijuana,  
15 cocaine at one point and a lot of other things.

16 Q. How were these drugs obtained?

17 A. Aaron would purchase them through a separate account  
18 and they would be shipped either to our friends' houses or a  
19 few times at the beginning it was shipped to our house that  
20 we lived at.

21 Q. What was your involvement in purchasing those items?

22 A. I had no involvement in purchasing those. Aaron had  
23 control of all of the accounts. He had the selling account  
24 that he would sell from and he had a separate account to buy  
25 from, and he would do all of the purchasing through that.

1 The only thing he ever asked me for was to think of any  
2 friends that we could send drugs to, sent to their house  
3 instead of sending it to ours.

4 Q. What about the shipping and packaging at that time?

5 A. I was still doing all of the shipping and packaging for  
6 all of the orders per day.

7 Q. Where would you do that?

8 A. In my room.

9 Q. Where did Mr. Shamo do the computer part?

10 A. In his room. We lived in the basement and his room was  
11 just down the hall and over to the side.

12 Q. Did you have much interaction in his room with the  
13 computer stuff?

14 A. Not really.

15 Q. What did you ship those in at that time?

16 A. Padded envelopes and flat rate priority envelopes,  
17 those from the post office. The padded envelopes we would  
18 buy from Walmart and various sources locally.

19 Q. Tell us more about the G.H.B. What did it look like  
20 and what was it shipped in?

21 A. Aaron ordered it through the guys as being wheel  
22 cleaner from China or somewhere, so it would come in a  
23 one-liter bottle. Then we would have to find out some way  
24 to get sodium hydroxide. We would mix the precursors.  
25 Aaron would always -- we had a glass beaker and Aaron would

1 go into the bathroom where we had an air vent and he would  
2 mix the quantities together and then bring that to me and I  
3 would put that in individual vials to send out.

4 Q. Did you ever try G.H.B.?

5 A. I did.

6 Q. Approximately when?

7 A. September of 2014.

8 Q. Where were you?

9 A. I was at my friend's house.

10 Q. Did you guys also go to Park City Live?

11 A. Yes.

12 Q. When did you meet Sasha? Who is Sasha Grant?

13 A. Sasha Grant is my girlfriend. She was my girlfriend at  
14 the time and she is now my fiancée.

15 Q. Where and when did you meet her?

16 A. I met her at Park City Live about the end of September  
17 in 2014.

18 Q. And you guys have been close friends and now your  
19 fiancée?

20 A. Yes.

21 Q. You had G.H.B. and you added a few other things. Did  
22 you add even more items in about October of that same year,  
23 2014?

24 A. Yes.

25 Q. What was that?

1 A. Around that time we added Xanax, we added magic  
2 mushrooms, psilocybin, and then around the end of October,  
3 early November there was cocaine that was purchased.

4 Q. Let me back up. Let's first talk about M.D.M.A. You  
5 already mentioned that.

6 A. Yes.

7 Q. What did that look like?

8 A. It was a brownish crystal -- almost like candy looking,  
9 like a light brown, crystal looking thing.

10 Q. Was there a process to getting that ready to send?

11 A. Yeah. We had to use a mortar and pestle and crush it  
12 up into powder and then put it into individual capsules.

13 Q. Work intensive?

14 A. Yes.

15 Q. Ultimately that was discontinued in you guys'  
16 inventory?

17 A. Yes.

18 Q. You said you were getting I believe Xanax at that time?

19 A. Yes.

20 Q. How did you guys get that?

21 A. It was just shipped internationally. I believe Aaron  
22 was using some vendor in India to send that over.

23 Q. What was your involvement in obtaining that?

24 A. I had no involvement in obtaining that. Aaron would  
25 sometimes purchase new things without telling and it would

1 just show up, and then all of a sudden I would see an order  
2 with a new drug that we had not sold previously. He would  
3 come in with a package and say here, this is what we're  
4 selling now.

5 Q. And you would package that stuff and send it?

6 A. Yes.

7 Q. Tell us about the money at this time. This is from  
8 June when you guys kind of are started selling Adderall and  
9 now we are in October and you said you had been packaging  
10 things. How is the money flow at this time?

11 A. At this time I don't really know. I would just get  
12 information from Shamo. Everything at this point was pretty  
13 much reinvested to buying more drugs and to diversify the  
14 drugs that we were selling. The original plan was to be  
15 done by September or October, make a quick 30, 40,000 and  
16 then, you know, end our operation. That didn't come as  
17 quickly as we had hoped and we had to keep pushing that end  
18 date out. So at this point until October, neither Aaron nor  
19 I had received any sort of payout or any profits.

20 Q. You also talked about some cocaine.

21 A. Yes.

22 Q. Where did you guys get that?

23 A. We had a mutual friend who was always talking to us  
24 about our business and buying personal items for himself.  
25 He approached us and wanted to make an investment. This

1 investment would help us get up on our feet quicker, get  
2 more inventory to sell quicker, and so he approached us  
3 about investing \$10,000. Aaron wanted to originally process  
4 cocaine leaves, coca leaves and process the cocaine  
5 ourselves. Eventually we decided to purchase cocaine and  
6 M.D.M.A. with that money.

7 Q. And that is approximately when?

8 A. The end of October or early November of 2014.

9 Q. Was there another incident with a smaller amount of  
10 cocaine that got you in trouble?

11 A. Yes. Aaron had purchased about ten grams or so. He  
12 sent that to our roommate at our address under our  
13 roommate's name and that package was seized. Later on in  
14 2015, in about February our roommate was called in to  
15 Homeland Security and interviewed.

16 Q. Do you know how that went?

17 A. Ultimately the Homeland Security agents didn't pursue  
18 that at all, but it definitely gave Aaron and I a big scare  
19 and a shake-up. We removed all the drugs from our house and  
20 cleaned everything up and shut down for a few days.

21 Q. That ten grams of cocaine was sent to that roommate  
22 under his name?

23 A. Yes. It was sent to Clancy Cooper at our address under  
24 his name and it was sent from Peru, I think.

25 Q. And I believe you previously stated that you and Mr.

1 Shamo were trying to find other people who would receive  
2 items in their name?

3 A. Yes.

4 Q. Did you guys have a term for that?

5 A. We called that a drop.

6 Q. Explain what a drop is.

7 A. So it is dangerous to send drugs to yourself in your  
8 own name. So through the research that Aaron did online he  
9 figured that what we would do is tell our friends, hey,  
10 we'll give you \$50, we'll give you \$100 if we can send a  
11 package to your house in your name. Don't open it. When  
12 you get it, let us know and we'll come and pick it up and  
13 hand you cash.

14 Q. Did you and Mr. Shamo have some conversation about who  
15 to recruit to do that?

16 A. Yes, we did.

17 Q. Who did you guys come up with?

18 A. We chose mutual friends. One of them was Sean Gygi.  
19 He was my team member at eBay. I knew him. And then we  
20 also recruited other friends that we knew either through  
21 eBay or through various sources. Katie Bustin was one.  
22 Alex Tonge. We asked a few other people. Some of them  
23 turned us down, though.

24 Q. If you would look to your left. Sorry. I'm challenged  
25 here.

1 Do you recognize some of the folks on that chart?

2 A. Yes.

3 Q. Who do you recognize?

4 A. Obviously Aaron at the top. Me and Luke Paz, Alex  
5 Tonge, Katie Bustin, Sean Gygi, Mario Noble, Penrose in the  
6 lower left, Vance, Jordan Vance, Jessica Gleave, Roy  
7 Stevens, Clint Perry, Jessica Francom and that is it.

8 Q. Of those, who were drops?

9 A. Let's see. So initially Mario Noble was not a drop,  
10 but he became one later on. Alex Tonge, Katie Bustin, Sean  
11 Gygi and Jordan Vance was a drop. Those are all the ones  
12 that I know about.

13 Q. Tell me a little bit more about the recruitment  
14 process. Let's talk about Mr. Gygi. How did that go? You  
15 knew him at eBay. Did Mr. Shamo know him a little bit, too?

16 A. Yes. We had gone to various concerts and parties  
17 together. Shamo and I were both very familiar with him, so  
18 we approached Sean and said, hey, we're looking for someone  
19 to help us out. You can make a couple extra hundred dollars  
20 a month. Are you interested? He expressed some interest  
21 and so we kind of gave him a rundown of what this would all  
22 entail. We tried to keep the focus on how much money he  
23 would make and not exactly what we were going to do. We  
24 were a little deceptive in that respect.

25 Eventually with questions and whatnot, we had to



1 disclose what was actually going to happen. We would say,  
2 you know, we'll send you four or five packages a month and  
3 we'll pay you \$50 to \$100 per package. Don't ever open  
4 them. If anyone ever comes asking about it or you get  
5 interviewed by the police, just say you never ordered it,  
6 and because we ordered it and not you, there is no evidence  
7 that you ever purchased that. We would tell them that, you  
8 know, they can't really get a conviction out of that because  
9 there is no evidence that you made the order and you can't  
10 control who sends you packages.

11 Q. You and Mr. Shamo had talked this out and kind of had a  
12 sales pitch, for lack of a better term?

13 A. Yes.

14 Q. Would you and Mr. Shamo always meet with these people  
15 together?

16 A. Not always.

17 Q. Tell me about that.

18 A. Sometimes Aaron would approach people that he knew and  
19 sometimes I would approach people that I knew. A lot of  
20 times if they were mutual friends we would both approach  
21 them together, but it really just depended on who it was.

22 Q. Ultimately did it take Mr. Shamo's approval for  
23 somebody to become a drop?

24 A. Yes.

25 Q. You spoke about an investment here. Did somebody

1 invest in the business?

2 A. Yes, Miles Penrose.

3 Q. He is on the chart there?

4 A. Yes, the lower left.

5 Q. Tell me how that came about.

6 A. We were at Park City Live and Miles just started small  
7 talk with Aaron saying how is your business going, because  
8 at that time Miles was purchasing personal drugs, personal  
9 amounts. He approached Aaron and said how are things going.  
10 I guess, you know, I heard about this later, but the gist of  
11 the conversation was that things are going good.

12 MR. SKORDAS: I object if he heard about it later.  
13 It is hearsay.

14 THE COURT: Sustained.

15 BY MR. STEJSKAL

16 Q. Let's not say any statements that you heard secondhand.  
17 What do you know personally about that recruitment?

18 A. Okay. What I know personally is after talking with Mr.  
19 Shamo, Miles approached both of us and said I would like to  
20 make an investment. I will give you some cash and you can  
21 purchase more drugs and then you can sell more and make more  
22 profit quicker. He was essentially investing his capital  
23 that he had in his business into ours.

24 Q. What was his business if you remember?

25 A. He is a car dealer.

1 Q. How much did he invest?

2 A. \$10,000.

3 Q. How did that come to you guys?

4 A. It came in cash.

5 Q. Who did he give it to?

6 A. He gave it to Aaron.

7 Q. Do you know how Mr. Shamo invested it?

8 A. Yes. Some of that we kept so that we could pay for  
9 shipping supplies and stamps and various items that we  
10 needed, and then Aaron and I both made a wire transfer to a  
11 Bitcoin exchange. I purchased \$3,000 worth of Bitcoins and  
12 Aaron purchased \$3,000 worth.

13 Q. Why Bitcoin?

14 A. Because we needed Bitcoins to buy more drugs on the  
15 dark net markets.

16 Q. What was then purchased with that money?

17 A. Cocaine, one kilogram, and M.D.M.A.

18 Q. How did the cocaine sell?

19 A. Sorry. What was that?

20 Q. How did the cocaine sell, meaning fast or slow or did  
21 it take a while?

22 A. It took about two or three months to go through that  
23 kilogram, but it sold fairly quickly. There were five to  
24 six orders a day for anywhere between a gram to three grams.

25 Q. And the profit comes from selling it in smaller

1 amounts?

2 A. Yes. You break it down from a kilogram brick into one  
3 gram and half gram amounts and sell those at a higher  
4 markup.

5 Q. Are you aware if there was any written agreement  
6 between Mr. Shamo, yourself and Mr. Penrose?

7 A. There was not.

8 Q. The time frame here we're talking about is the end of  
9 2014 now?

10 A. About November of 2014.

11 Q. Tell me what is going on at eBay at that time.

12 A. At that time I was struggling with my stats and just  
13 struggling altogether. The job was very stressful and very  
14 demanding and I was put on probationary status around that  
15 time. Our lease was up at our current place and so in  
16 November of 2014 we moved to a house on Murphys Lane, 1383  
17 East in Salt Lake.

18 Q. Which is roughly 38th South or so?

19 A. Yes.

20 Q. Who all moved in that residence?

21 A. Aaron, me and Clancy Cooper.

22 Q. That is in November. Then what happened at eBay in  
23 December?

24 A. At the very end of December I had gotten to the point  
25 where I was going to be fired and eBay allowed me to quit

1 gracefully instead of, you know, having an official  
2 termination. So at the very end of December I was let go  
3 from eBay.

4 Q. How about Mr. Shamo?

5 A. He quit two or three days later.

6 Q. Let's talk about what was going on with you and Sasha  
7 Grant at this time.

8 A. At that time we were getting closer and in the middle  
9 of December she was feeling distant from me a little bit and  
10 she said you're spending a lot of time doing other things.  
11 I didn't clue her in to the drug dealing immediately. I  
12 kept that a secret from her and occasionally I would have to  
13 go leave for an hour or two to go package drugs for the  
14 night and not tell her. So she was not sure that I was  
15 being faithful or that I had my heart in that relationship.

16 So at our company Christmas party she confronted me and  
17 said what is going on? You know, I'm about to break this  
18 off. So I came clean to her and I told her that Aaron and I  
19 were dealing drugs and that I am doing this only as a  
20 short-term measure to pay off student loans and debt and to  
21 help myself out financially. I told her that initially it  
22 was only supposed to be four or five months but things are  
23 going slower than we expected. I let her know that this is  
24 not something I want to do long-term or permanently, that  
25 there was always an end date in mind for me, and I don't see

1 this as a viable career choice at all.

2 Q. How did she take all of this?

3 A. It was very rough on her. She didn't take it too very  
4 well at all initially. She was very on the fence about  
5 continuing our relationship most of that December. At the  
6 end of December, over New Year's we went on a vacation to  
7 Mexico with my parents.

8 Q. When you say we, you and Ms. Grant?

9 A. Me and Ms. Grant and my parents.

10 Q. Tell us about that trip.

11 A. It was a humanitarian trip. We went down to an  
12 orphanage to help them rebuild some of their buildings and  
13 retile. My parents had a neighbor that had a nonprofit that  
14 was helping this orphanage, so we went down and helped them  
15 for a couple days and then spent New Year's in Mexico.

16 Q. Did that help you and Ms. Grant's relationship?

17 A. It did. We talked about a lot of things then and I  
18 told her exactly why I was doing this. I let her know at  
19 that time that I didn't really feel comfortable with this,  
20 but I was trying to get out from underneath my debt and help  
21 myself out financially. We kind of talked it over and  
22 smoothed things over a little bit.

23 Q. Did you guys eventually start using PayPal cards?

24 A. Yes. Around that time, in December of 2014 we were --  
25 occasionally we needed money for shipping supplies and

1 various things that we needed cash for and so we started  
2 trading Bitcoins for a PayPal cash card. Then from that  
3 PayPal cash card, we would deposit it into our PayPal  
4 accounts. PayPal has a debit card that you can buy or sign  
5 up for. PayPal sent me a debit card and I would sometimes  
6 use that debit card to purchase postage and shipping  
7 supplies.

8 Q. Did you end up with some problems with PayPal?

9 A. Yes. At the end of January of 2015 and the early part  
10 of February my PayPal account was suspended due to high risk  
11 and fraudulent behavior. PayPal does not like it when you  
12 purchase a cash card and then put that into your account and  
13 then immediately withdraw that into cash or make purchases  
14 right away. It sets off some of their fraud alerts and  
15 fraud filters.

16 Q. Was there an issue with some stolen PayPal cards as  
17 well?

18 A. Yes. We were purchasing PayPal cards through a site  
19 called localbitcoins.com. The people that I was purchasing  
20 these PayPal cards from had used stolen credit cards to buy  
21 them. So when those stolen credit cards were reported  
22 stolen later on by the people they were stolen from, PayPal  
23 got wind of that and thought Aaron and I were committing  
24 credit card fraud and so they suspended my account.

25 Q. Did Ms. Grant kind of get in trouble for this too?

1 A. Yes, she did. My account had gotten suspended. Aaron  
2 was putting pressure on me to use other people's accounts as  
3 well to launder money, and so I used Sasha Grant's account  
4 to launder \$1,000 through. Later on that ended up resulting  
5 in her termination from eBay.

6 Q. What do you mean by Mr. Shamo was putting pressure on  
7 you?

8 A. So Aaron was asking me if there were any other people I  
9 know that have PayPal accounts, because PayPal has a limit  
10 of how much money you can deposit via a cash card per month  
11 and I had hit that limit in paying for postage and shipping  
12 supplies and paying for my own bills.

13 At this point in January, I was subsisting only on the  
14 proceeds from the drug business. I had no job and so I had  
15 to pay my rent and car and cell phone payment and such. I  
16 reached out to Sasha to use her account. Aaron reached out  
17 to his friends, his girlfriend and their friends,  
18 specifically Natalie Madson, Julian Webb, his girlfriend at  
19 the time, Luke Paz, various other people that we knew that  
20 we could use their PayPal account.

21 Q. You said you were then pulling some money out of the  
22 business. Was Mr. Shamo pulling some money out too to live  
23 on?

24 A. Yes.

25 Q. He was not working either, correct?



1 A. Yes.

2 Q. Other than in this organization?

3 A. Yes.

4 Q. Let's go back a little bit and start talking about the  
5 drug business again. Was there a point around this time  
6 frame, maybe late 2014, that you got a bad batch of Xanax?

7 A. No. There was one in 2015, but in 2014 I don't believe  
8 there was one.

9 Q. Maybe I have that wrong. Let's talk about the account  
10 that you were running at the end of 2014 and 2015.

11 A. Okay. That would be jean001 on Agora.

12 Q. Okay. Was there a problem there?

13 A. Not that I was made aware of. I never handled any of  
14 the customer service side of things or any ordering, so I  
15 was not really made aware of anything.

16 Q. Maybe I have my timing off here in the switch from  
17 jean001 to the other account.

18 When was that?

19 A. That was around the summer of 2015 into the fall of  
20 2015.

21 Q. I have my timing off. I apologize.

22 Mr. Penrose, back to him, he made this \$10,000  
23 investment. How was he to be paid back?

24 A. Paid back in cash at a later date. We didn't have a  
25 specific time frame, but we let him know it would be four or

1 five months and we were going to double his investment to  
2 \$20,000.

3 Q. Were you guys able to pay him back immediately?

4 A. Not immediately. We kept reinvesting all of that money  
5 into more quantities and various other drugs.

6 Q. Then in about April of 2015 was there a car purchase?

7 A. Yes. Our friend Benjamin Kennard was selling his car  
8 and Aaron wanted to buy it. So per our agreement any money  
9 pulls out, I am going to get 50 percent of what he pulls  
10 out, so I get one-third and he gets two-thirds. Aaron  
11 pulled out \$15,000 to pay for that car and I received 7,500  
12 at that time.

13 Q. What kind of car was that?

14 A. It was a 2008 B.M.W.

15 Q. Did Mr. Shamo continue driving that for quite some  
16 time?

17 A. Yes.

18 Q. Tell us about the business at that time. Is it  
19 growing? Is it doing okay?

20 A. Yes. At that time there were about 45 to 60 orders per  
21 day. It was staying pretty consistent from about January of  
22 that year all the way throughout -- that is about when we  
23 hit the peak of orders per day. We were selling various  
24 drugs at that point. In April we had finally sold out of  
25 cocaine, but we were selling M.D.M.A., L.S.D., marijuana,

1 lots of Xanax, various other pills, Valium, Cialis, Viagra,  
2 Ambien, just anything.

3 Aaron's goal with the site was to be a one-stop shop  
4 and offer everything to everyone and then, you know, people  
5 that are purchasing one drug consistently would say, oh,  
6 maybe I want to try something else. You know, I already  
7 have a rapport with the seller and I will buy it from him.

8 Q. Were these drugs you were selling, are any of these  
9 manufactured by you guys or are these still getting bought?

10 A. Only the G.H.B. at that time was manufactured by us.  
11 Everything was just bought in bulk and break it down into  
12 smaller quantities and resell.

13 Q. And approximately how many orders would you guys be  
14 going through in a given day or week or however you can  
15 break it down?

16 A. We would ship things out about five days a week and we  
17 had about 40 to 60 orders a day, anywhere between 250 to 300  
18 orders a week.

19 Q. How many pills -- what kind of quantities?

20 A. Usually in between a gram to three grams of various  
21 substances. Xanax would sometimes be upward of 100 or 200  
22 at a time, but generally it was less than 50 at that point.

23 Q. That probably involved a lot of postage and a lot of  
24 packaging?

25 A. Yes.

1 Q. Where did you get the postage?

2 A. We would purchase it from post offices. Aaron also  
3 would purchase it from Amazon and eBay. You can purchase  
4 prepaid postage through there. A lot of our postage came  
5 from that. But then I also would stop off -- on my daily  
6 drop-offs I would go into the post office and purchase  
7 stamps with cash or with a debit card.

8 Q. Let's look at Exhibit 17.00. Look on your screen  
9 there.

10 Do you recognize that?

11 A. Yes.

12 Q. What is that?

13 A. That is purchasing postage from the post office. We  
14 would send out the prepaid envelopes which required about \$6  
15 worth of postage, so we would buy these big stamps that are  
16 \$5.75 apiece and then add one other 50 cent stamp to cover  
17 the postage. Those are the amounts, so \$184 and \$115, that  
18 is, you know, roughly 20 or 30 each day.

19 Q. Do you see the dates there in the left column?

20 A. Yes.

21 Q. This is the time frame around February and March of  
22 2015?

23 A. Yep.

24 Q. Does that look consistent with kind of the amounts of  
25 postage -- you said you were buying it in various manners.

1 This was one of the manners?

2 A. Yes.

3 Q. Does this look consistent with what you were saying?

4 A. Yes. A lot of times we would purchase with cash to try  
5 and avoid any sort of financial record, so these purchases  
6 with a debit card definitely do not reflect the total amount  
7 of postage we were buying.

8 MR. STEJSKAL: Blow that back up again and let's  
9 look at the second page.

10 BY MR. STEJSKAL

11 Q. Same thing?

12 A. Yes. Those look like purchases made with my PayPal  
13 debit card. It was banned or restricted at the end of  
14 January. Most of these purchases would have been made with  
15 that card.

16 Q. I think you said it kind of peaked -- did you say in  
17 March --

18 A. Yes.

19 Q. -- as far as sales?

20 A. Um, no. I mean, it was pretty consistent from  
21 January of 2015 on. Once we bought a pill press later on in  
22 the year, then things started getting into large, large  
23 quantities, but I think that from January to June of that  
24 year our sales were pretty consistent.

25 Q. Let's talk about Ms. Grant and her termination from

1 eBay. When was that?

2 A. That was in May of 2015.

3 Q. And presumably you had a conversation with her when  
4 that happened?

5 A. Yes.

6 Q. Tell us about that conversation.

7 A. So one of our other friends at eBay was committing  
8 fraud by removing feedback for bribes and money, and so they  
9 started investigating all of her known friends and people  
10 that she worked with. Sasha was one of those. So they  
11 initiated an investigation with her, and then they found out  
12 that she was linked to Aaron's and my PayPal accounts. My  
13 PayPal account was suspended in January and Aaron's was  
14 suspended in March, along with a lot of our other friends'  
15 accounts that we were using.

16 So through eBay they were investigating and found out  
17 that she was linked to all these other people that were  
18 suspended for fraud, so they pulled her into a room at eBay  
19 and interrogated her for a couple hours. They were asking  
20 her about stolen credit cards and removed feedback and, you  
21 know, what are Aaron and Drew doing with all of these stolen  
22 cards? Because at the time eBay thought Aaron and I were  
23 committing credit card fraud. In reality we were just  
24 trading Bitcoins for cards. Where those cards had been  
25 purchased from was not from us but it was from stolen credit

1 cards.

2 Q. She she got terminated and then you and she had a  
3 heart-to-heart about your future, correct?

4 A. Yes. We were -- we basically had the biggest fight we  
5 have ever had and she was basically ready to end it at that  
6 point because indirectly, from what Aaron and I were doing  
7 led to her getting fired and she had a really good job there  
8 and was very, very frustrated with me. We kind of took a  
9 week apart to think about everything.

10 Eventually -- ultimately her and I decided that at that  
11 point I needed to have an end date in mind, because I had  
12 just been pushing everything back. She kind of gave me an  
13 ultimatum and said you have to be done by a certain date or  
14 I'm not going to continue this relationship anymore. The  
15 date that Sasha and I agreed on was September 1st.

16 Q. Of 2015?

17 A. 2015, yes.

18 Q. Okay. Did you then have a conversation with Mr. Shamo?

19 A. Yes.

20 Q. Tell us about that.

21 A. So after talking this over with Sasha and deciding to  
22 leave, I told Aaron don't worry about the one-thirds,  
23 two-thirds split anymore. All I want you to do is cover my  
24 bills so I can pay my monthly bills, and then in  
25 September -- on September 1st I would like a payout of

1 \$40,000 so that I can pay off my student loans, and then I  
2 am completely done and I'm no longer going to do this with  
3 you.

4 Q. That 40,000, is that roughly what your student loans  
5 were at that time?

6 A. Roughly, yes.

7 Q. You discussed that Xanax was a product that you guys  
8 were selling?

9 A. Yes.

10 Q. What was the profit margin on that, buying it off of  
11 whenever you bought it and then reselling it?

12 A. I would say about two and a half to three times the  
13 money that you spent on the purchase was what you would get  
14 out of it once you broke it down.

15 Q. In other words, if you spent \$1,000, you would make  
16 2,500 to 3,000?

17 A. Yes.

18 Q. Did you have a discussion with Mr. Shamo about how  
19 maybe you could increase that profit margin?

20 A. Yes. Aaron was looking into other ways to increase  
21 that, and so we started researching pill presses and  
22 pressing the pills ourselves.

23 Q. What did he tell you about that?

24 A. He told me that the profit margins for that were a lot  
25 higher and we can make a lot more money quicker and that way



1 I could get a payout by September 1st and I could receive  
2 the full amount.

3 Q. Was there a particular way that you guys communicated  
4 using electronic devices?

5 A. Yes. We used an app called Telegram.

6 Q. How did you come about that?

7 A. Through research that Aaron did initially in the summer  
8 of 2014. We were always trying to communicate and we knew  
9 that text messages were not encrypted and they were not  
10 safe. They are likely to be snooped upon and read. You can  
11 receive them from record subpoenas and stuff, so he  
12 approached me and told me about this app called Telegram.

13 What the app will do is it encrypts your messages  
14 between you and this other party. You can set up a secret  
15 chat, set up self-destruct timers and various things. It is  
16 essentially a way to communicate with privacy.

17 Q. You're saying Mr. Shamo came to you with that?

18 A. Yes.

19 Q. He told you to use it?

20 A. Yep.

21 Q. Did you guys start using it basically from that point  
22 on?

23 A. Yes.

24 Q. Did you guys use that with other people to communicate  
25 with as well?

1 A. Yes. We specifically told our drops, you know,  
2 download this. It is a free app. Set it up and only chat  
3 with us through the secret chat option. If you chat with us  
4 regularly, those can be read by other parties.

5 Q. Back to the pressing idea. So Mr. Shamo had discussed  
6 that with you that possibly you could make more money that  
7 way. How did that progress from that first conversation?

8 A. So later that summer Aaron went ahead and purchased a  
9 pill press.

10 Q. When you say Aaron did, what do you know about that?

11 A. Aaron purchased it from China. I don't even know where  
12 he purchased it from or where he went to get that. Again,  
13 Aaron had control of all of the money and all the  
14 purchasing, and so he just did some research online and  
15 found a company that would sell him a pill press and ship it  
16 to our house.

17 Q. To be clear, you were okay with that idea?

18 A. I was hesitant, but at that point I did have an end day  
19 in mind and I thought, you know, if that gets me to that  
20 eventual goal of \$40,000 quicker, then that is okay. I'm  
21 okay with that.

22 Q. When did you guys receive the pill press?

23 A. In July of 2015.

24 Q. Right around this same time was there a discussion  
25 about help with packaging?

1 A. Yes. Because I was going to discontinue work in  
2 September, we started chatting like, you know, who can take  
3 over my responsibilities in packaging and shipping every  
4 day. We decided to approach Katie and Alex and have them  
5 take over the shipping part of the operation every day.  
6 Then that would slowly phase me out of the business.

7 Q. By Katie and Alex you mean Katie Bustin and Alex Tonge?

8 A. Yes.

9 Q. They were acquaintances from eBay?

10 A. Yes.

11 Q. How did you guys approach them?

12 A. We met them at a bar downtown, went up on the patio and  
13 had a little privacy and we basically said I'm leaving. I  
14 am not going to be doing this after September. I need  
15 someone to take over my responsibilities each day. Are you  
16 guys interested in making more money than you are now as our  
17 drops?

18 Q. When you say we, that is you and Mr. Shamo?

19 A. Yes, me and Aaron.

20 Q. What was their reaction?

21 A. They were okay with it. They took a day or two to  
22 think about it I think, but then came back and said they  
23 wanted to continue with that, that they could use the extra  
24 money to pay off their debts and their loans.

25 Q. How did you and Mr. Shamo get them involved?

1 A. I went over to their house about three or four days in  
2 a row and taught them how to do my portion of the work. I  
3 brought over a bunch of shipping supplies and quantities of  
4 drugs. I sat with them a few nights and helped them set up  
5 their e-mail -- not e-mail, their encryption program so that  
6 they could speak with Aaron via e-mail. I showed them how  
7 to package all of the drugs, vacuum seal them, put them in  
8 envelopes, and how to print shipping labels or address  
9 labels.

10 Q. So you spent a few days with them showing them how to  
11 do all those things?

12 A. Yes.

13 Q. At their home?

14 A. Yes.

15 Q. You said that you showed them or installed the  
16 communication app. What were you talking about there? What  
17 in particular --

18 A. I was using the Apple operating system and so were  
19 they, and Aaron was using Windows, and so Aaron set up their  
20 e-mail account and e-mailed the encryption key. Not  
21 e-mailed.

22 He gave me the encryption key and then I set up the  
23 program that they were eventually going to use on my  
24 computer to just see how it worked. I drove over to their  
25 house with a flash drive with his encryption key on it.

1 Then I sat with them on the computer and showed them the  
2 program to install and helped them add his public encryption  
3 key to their computer so they could read the messages that  
4 he sent to them and they could encrypt messages to send back  
5 to him.

6 At that time I also logged in to the e-mail account  
7 that Aaron had created and I sent them an e-mail with some  
8 instructions just as a backup.

9 Q. To help us understand, you're saying Aaron created  
10 these things and you are installing these things?

11 A. Yes. Aaron created the e-mail account. I logged in  
12 once to send an e-mail through that account and to get them  
13 the encryption keys they needed so that they could speak  
14 back and forth with Aaron.

15 Q. Do you remember what the e-mail account was called or  
16 what their address would have been?

17 A. Yes. Aaron's e-mail account was americansteam, and  
18 Katie and Alex, their e-mail account was passthepeas.

19 Q. What do you mean by the decryption or key?

20 A. So they were using a method to communicate called  
21 P.G.P. There is a public key and a private key. By key  
22 what I mean is a long stream of characters and numbers that  
23 is just randomly generated. What you do is you encrypt your  
24 message with the public key, and then the only way to read  
25 that message that has been encrypted is to use the private

1 key to decrypt it. Again, it is pretty complicated  
2 mathematics and I have no idea how it works. I had just  
3 used it before.

4 Q. Mr. Shamo was using this as well?

5 A. Yes. He would use that on a daily basis. Anyone who  
6 would create an order would use his public P.G.P. key to  
7 send him a message with their address. Every day every  
8 single order that he received he would have to decrypt each  
9 message to obtain people's shipping address that they wanted  
10 the drug sent to. Once they were decrypted, he would pass  
11 that over to me and I would package everything up.

12 Q. You said that he created this for them and you set it  
13 up. What about his encryption side of things, did you have  
14 to set that up for him or did he set that up himself?

15 A. No. He set up his own encryption keys and he set up  
16 their encryption keys as well.

17 Q. How about actually on his system, though, you set up  
18 their account on their computer. Did you have to set his up  
19 on his computer?

20 A. No. He did that himself. He already had it set up  
21 from all of his daily orders for the last year, so it was  
22 just already there for him. I never once logged on to his  
23 computer and used it.

24 Q. So that was the e-mail system to communicate orders and  
25 such?

1 A. Yes.

2 Q. What about like the texting system?

3 A. Through Telegram he would communicate with them, with  
4 Katie and Alex directly through Telegram. I was not a part  
5 of those messages. We never set up any group chats or  
6 anything. It was just direct, you know, person-to-person  
7 communication.

8 Q. How did Ms. Tonge and Ms. Bustin get Telegrams?

9 A. They downloaded it when they first became drops for us.  
10 We just had them download it and that is how we would  
11 communicate.

12 Q. When you say we, did you install it for them or did Mr.  
13 Shamo direct them to use it? How did that go if you recall?

14 A. They installed it on their own. I believe it was Aaron  
15 that told them both about the app. He just said, hey,  
16 download this app. It is free. Once you have the app  
17 downloaded, send me a message.

18 Q. Were there kind of strict instructions telling them to  
19 use encrypted communication?

20 A. Yes.

21 Q. So they are on board now. Let's get back to the pill  
22 press. You said July of 2015?

23 A. Yes.

24 Q. How does that arrive or where does it arrive?

25 A. It gets delivered to our house on Murphys Lane. It

1 comes in a big wooden crate. So Aaron and I took that  
2 downstairs. We disassembled the crate. There was a storage  
3 closet that we would package everything from. It was  
4 connected to Aaron's room and only accessible through  
5 Aaron's room. We placed it inside there on a wooden bench  
6 and we set it up there.

7 Q. Then there was a Lake Powell trip in there somewhere?

8 A. Yes. I went to Lake Powell with my family in early  
9 August so I was out. By that time, though, Katie and Alex  
10 had taken over all of the packaging of daily orders and it  
11 was Aaron taking care of the customer service and all of  
12 that and sending them daily e-mails of what drugs to package  
13 and who to package and send it to.

14 Q. To your understanding the business kept running while  
15 you were on that trip?

16 A. Yes.

17 Q. Did you and Ms. Grant solidify your travel plans around  
18 that time?

19 A. Yes. So after our argument in May, we decided in June  
20 and July that we were going to leave the country and do a  
21 lit bit of traveling. She did some research and found these  
22 visas that New Zealand offered where you can live there for  
23 a year if you are under 30 and single and various other  
24 stipulations. So around the middle of August, Sasha Grant  
25 and I purchased one-way plane tickets to New Zealand.



1 Q. When did the press start running?

2 A. Towards the end of July in 2015.

3 Q. So before you went on that Lake Powell trip?

4 A. Yes.

5 Q. Did it run while you were gone?

6 A. Yes, it did.

7 Q. Who ran it?

8 A. Aaron did.

9 Q. Tell us about the initial setup then. How did you come  
10 up with setting it up and figuring out what to put in there?

11 A. Aaron did a little bit of research on the press name on  
12 YouTube and someone else had created a how-to video on how  
13 to set up the pressure and the injection height and various  
14 parts of it. So Aaron and I both watched that, and then we  
15 would go into the separate room and we would run filler or  
16 the inert substance in each pill, and it does not have any  
17 active ingredient, and we would figure out how to set it up  
18 correctly so the pills wouldn't chip, so it would eject and  
19 be the correct weight that we were trying to obtain.

20 Q. You say we, so you are both in there doing that?

21 A. Yes.

22 Q. Is one of you more hands-on than the other?

23 A. I kind of have a mathematical and engineering  
24 background. So at the direction of Aaron, I was kind of the  
25 one, you know, switching all the gears and making the

1 adjustments. Then I would take the pressed pill to Aaron  
2 and say how does this look? Is this the right weight. Does  
3 this feel right? Does this crush right? It was a joint  
4 effort, but I did a lot of the hands-on work.

5 Q. How about when you were going to add the active  
6 ingredients, how did that work?

7 A. Aaron came up with the amount of active ingredient that  
8 he was looking for. In this case we were pressing Xanax.  
9 He wanted three milligrams in each bar. He purchased a mold  
10 for a two milligram bar that you can get from the pharmacy.  
11 So we would set up the machine and run the inert substance  
12 and just filler and no active ingredient and figure out the  
13 weight of the pill. And then based on the weight of the  
14 pill, we would just do a little ratio algebra problem to  
15 figure out how much active ingredient and how much filler  
16 you needed to combine to get the desired dose.

17 Q. How would that get mixed and kind of put in to make it  
18 work?

19 A. We would mix them in glass Mason jars. So we would add  
20 the active ingredient and then add the filler, and then we  
21 would just take the Mason jar and shake it for ten to 15  
22 minutes and roll it around.

23 Q. I don't want to pass this over. I guess I heard you  
24 say there was a two milligram Xanax that sold as a  
25 legitimate pharmaceutical?

1 A. Uh-huh.

2 Q. And you guys used that mold but put three milligrams  
3 in?

4 A. Yes.

5 Q. Why?

6 A. Aaron wanted the pills to be strong. He wanted people  
7 to get good reviews. You are selling a new product and you  
8 have no feedback on it, you know, people will have a hard  
9 time trusting it. So he wanted to built up good feedback  
10 and people saying this is good stuff and this is exactly  
11 what I ordered.

12 Q. You said there was an algebraic formula for how much  
13 filler goes in with how much active ingredient.

14 A. Yes.

15 Q. Was that written down anywhere?

16 A. Initially it was not.

17 Q. How about later?

18 A. Yes. Later on I created a little computer program, I  
19 guess. It is hardly a program, but essentially you run, you  
20 know, say, 100 pills with the inert substance and you figure  
21 out the average weight of each pill. Say the pill is 100  
22 milligrams and you're looking for a ten milligram active  
23 ingredient. So you put in the weight of your pills and then  
24 you put in your desired active ingredient amount and what  
25 you want that to weigh, and then the program would say, you

1 know, if you have got a 100 milligram pill and you want 10  
2 milligrams of active ingredient in it and the rest to be  
3 filler, you need to add a one to nine ratio.

4 Q. When you left the country you left that for Mr. Shamo?

5 A. Yes.

6 Q. So at this time when you first set up this press, what  
7 were you guys pressing?

8 A. Xanax.

9 Q. Anything else?

10 A. We tried to press M.D.M.A. into pills and then there  
11 were steroids, Turnable, and then there was another pill,  
12 Etizolam. I am not really sure what that is.

13 Q. Where those other drugs fairly short lived?

14 A. Yes. They only lasted one or two runs, one or two  
15 weeks. There was not much to press.

16 Q. How about Xanax?

17 A. That was kind of the main moneymaker. Aaron kept  
18 purchasing the active ingredient in larger and larger  
19 quantities. That was the main seller.

20 Q. You came back from Lake Powell and then how were the  
21 duties divided up at that time?

22 A. At that point I was trying to phase myself out, because  
23 I just started a new job as well, and so when I came back  
24 from Lake Powell, I was trying not to do any work at all.  
25 The press was something that Aaron was able to run on his

1 own. Katie and Alex were doing the shipping. Aaron was  
2 still taking care of the customer service and the daily  
3 orders.

4 Occasionally Aaron would come to me and need an errand  
5 run, I needed to run postage out to Katie and Alex or I  
6 needed to make a drop of more product to their house. So I  
7 had my full-time job and then I would squeeze that in in the  
8 evenings occasionally running some errands.

9 Q. Where was that job?

10 A. It was a company called Data2 Logistics in Murray.

11 Q. You said you had bought a one-way ticket to New  
12 Zealand. Why did you get a job at that point?

13 A. I needed to save money for our trip and, you know, I  
14 told Sasha I was going to be done by September 1st and that  
15 was my plan, and so I didn't want to just sit around from  
16 September to the end of November when I was going to leave,  
17 so I decided to get a real job.

18 Q. Tell us about any payouts from the drug business that  
19 you may have received prior to leaving the country in  
20 November.

21 A. So originally I am supposed to receive that 40,000.  
22 September 1st came and went and I received nothing. Aaron  
23 said that one of the batches of active ingredient that he  
24 purchased was not actually Xanax. We had no way to test it,  
25 and so he received that information via feedback once we had

1 already sold it. So he started getting a plethora of  
2 negative feedback and disputes online. Eventually they shut  
3 the account down, what you were referring to earlier. But,  
4 anyway, I started receiving payments in \$5,000 increments  
5 towards the end of September, partially through October, and  
6 then the last payment I received was about the first week in  
7 November.

8 Q. How much, total, were those payments?

9 A. I received \$20,000.

10 Q. In various increments?

11 A. Yes.

12 Q. Before I forget, let's go back to the bad reviews and  
13 the bad Xanax. Tell us about that.

14 A. So Aaron told me that the active ingredient was some  
15 sort of a cannabinoid, so it was kind of giving the same  
16 feeling as Xanax but it was not actually Xanax. This was  
17 the feedback he was receiving from customers. So eventually  
18 with enough bad reviews and disputes open on Agora, they  
19 shut the account down and terminated the account.

20 Q. That was your jean001 account on Agora?

21 A. No. Actually at that point that was our account on  
22 Evolution. Agora had shut down halfway through the summer  
23 and just turned everything off. They just decided to quit  
24 being a dark net marketplace and they just shut their  
25 company down. So the jean001 account was lost at that point

1 and Aaron set up other accounts online on different  
2 marketplaces, and the other marketplace is the one that we  
3 got banned from.

4 Q. That is Evolution that you talked about?

5 A. Evolution, yes.

6 Q. And that was because of bad reviews?

7 A. Yes.

8 Q. What did Mr. Shamo do next, then, to keep the business  
9 running?

10 A. He made sure that he found a new supplier for his  
11 active ingredient and he created a different account and  
12 started selling on that.

13 Q. Do you know what that new account was?

14 A. Yes. The new account was Pharma-Master on AlphaBay.

15 Q. What is AlphaBay?

16 A. AlphaBay is another dark net marketplace.

17 Q. When you say Pharma-Master, can you spell that?

18 A. P-h-a-r-m-a M-a-s-t-e-r.

19 Q. So Pharma like pharmacy?

20 A. Yes.

21 Q. Do you now how he came up with that name?

22 A. I don't. I think it was because he was selling Xanax  
23 at the time mostly, and that is what he wanted to focus on  
24 and Xanax is a pharmaceutical and the mold that we were  
25 using looked like pharmaceuticals, and Aaron was using the

1 press primarily to manufacture these drugs, and so he wanted  
2 to sell pharmaceuticals. So I think that is why he chose  
3 that name.

4 Q. What is the time frame on that when you migrated to  
5 AlphaBay and Pharma-Master?

6 A. Around October of 2015.

7 Q. When did you leave the country?

8 A. November of 2015.

9 Q. So you were there when it happened but not that long?

10 A. Yes.

11 Q. You said that you received approximately \$20,000 in  
12 increments from Mr. Shamo?

13 A. Yes.

14 Q. What, if anything, did you have to do to earn that  
15 during that time?

16 A. So Aaron had control of all the money and the accounts  
17 and any time I needed money, I had to go to him. He needed  
18 money to buy more product and more supplies, and so he would  
19 say, you know, if you go trade out these Bitcoins, I need  
20 5,000 for the business and I will allow you to cash out  
21 5,000 as well.

22 So I was running errands for him. I was laundering  
23 money for him. I was purchasing postage and taking it to  
24 Katie and Alex. I guess sometimes I would take gallon bags  
25 of Xanax, 10,000 or so at a time, out to Katie's and Alex's



1 house so they could package them up.

2 Q. As you were preparing to leave, what was the plan on  
3 how the press was going to keep running?

4 A. Aaron was able to run it himself, but he wanted to have  
5 someone else do that for him, so he recruited his friend  
6 Luke Paz to come over and be the new run the press guy and  
7 do that all for him.

8 So he invited Paz over about a week or two before I  
9 left and me and Aaron and Paz -- we all kind of sat there  
10 and showed Paz how to use the machine, how to set it up and  
11 all of that.

12 Q. Did you and Mr. Shamo all participate in that?

13 A. Yes.

14 Q. Were there things like calculations and changing things  
15 out that were necessary to make the machine run properly?

16 A. Yes.

17 Q. Who showed those?

18 A. I showed Luke how to do that. Aaron would say, hey,  
19 make sure he knows how to unjam the machine. Make sure he  
20 knows how to set it up when we need to change out the mold,  
21 so I would show Luke which screws to undo and which gears to  
22 adjust.

23 Q. Was Mr. Shamo also being shown that?

24 A. He knew already how to do that and how to set up the  
25 machine and how to adjust it.

1 Q. Did you in fact then use those tickets to New Zealand?

2 A. Yes.

3 Q. On what date?

4 A. November 27th of 2015.

5 Q. How much money did you have with you at that time?

6 A. I had \$17,000.

7 Q. Where did that come from?

8 A. That came from the proceeds of selling drugs.

9 Q. You said you had gotten 20,000. What did you do with  
10 the other --

11 A. I paid off my car and got rid of that and then I paid  
12 off my cell phone so that I could get it unlocked and it  
13 would work overseas.

14 Q. And once you left for New Zealand on November 27, 2015,  
15 what contact, if any, did you maintain with Mr. Shamo and  
16 the organization?

17 A. None. I basically just quit contact with him at all.  
18 During the fall our friendship really deteriorated quickly.  
19 I was frustrated because I hadn't been paid the full amount  
20 that we agreed on in May, and Aaron kept holding that over  
21 my head and, you know, using that to keep me doing errands  
22 for him and in the business and so our friendship  
23 deteriorated and I don't think we spoke for a full three or  
24 four months after that.

25 Q. When you left did you feel as if Mr. Shamo still owed

1     you money?

2     A.     Yes.

3     Q.     Who much did he owe you?

4     A.     \$20,000.

5     Q.     And you didn't pester him for it constantly?

6     A.     No.   Initially I had enough to go travel with and had  
7     enough of a savings account that I was okay, and I just  
8     didn't bother him, pester him each week for that.   I figured  
9     I would just cool off for a couple of months and then return  
10    back to that and ask him for money later.

11    Q.     Tell us about your travels.

12    A.     We traveled to New Zealand.   We initially lived in a  
13    house on the south island with eight other people.   Sasha  
14    and I got also jobs right away working for minimum wage at a  
15    restaurant and housekeeping at a little hotel nearby.   So we  
16    started, you know, to see the country and do a little bit of  
17    traveling and fun activities, but then we also worked during  
18    the week to try to offset the cost of that.

19           We purchased a car and sometimes we would go camping  
20    for the weekend and live out of the car.   We just wanted to  
21    see the country.   I wanted to make that clean break from the  
22    organization.   Everybody always, you know, would lump Shamo  
23    and I together, and I knew that everyone would continue to  
24    do that if I stayed in the country, and so we left the  
25    contrary to get away from that and to make that clean break

1 completely.

2 Q. Did Ms. Grant have some influence on that?

3 A. Absolutely.

4 Q. Now, you talked about working and you talked about some  
5 other travel. You guys took a lot of lavish travel pictures  
6 during that time, correct?

7 A. We did a lot of activities, because we were only in the  
8 country once and we wanted to see all the country had to  
9 offer so we prioritized that, but some of what you don't  
10 see -- you see the highlights of the trip, but sometimes we  
11 didn't have a place to live and we would go camping for the  
12 weekend and live out of our car. We were house-sitting in  
13 New Zealand so we didn't have to pay rent. We did all that  
14 we could. We would stay in hostels and dorm rooms to keep  
15 costs down. We just tried to live as cheaply as possible so  
16 that we could see all the country had to offer.

17 Q. Ms. Grant had kind of a travel blog and she was sending  
18 pictures to relatives and family?

19 A. Yeah. Instead of being asked by all of our relatives  
20 the same exact questions, we decided to set up a blog so  
21 that we could share that with our family so that we didn't  
22 get asked the same question over and over. What did you do  
23 this week?

24 Q. Were you showing pictures of house-sitting and the  
25 labor you were doing?

1 A. Yeah. We took a few pictures of the pets that we were  
2 taking care of and the houses that we were staying in and,  
3 you know, not so many pictures of us doing fruit picking and  
4 working in a restaurant or anything like that.

5 Q. Most of the pictures were beach pictures and you guys  
6 doing really fun travel things?

7 A. Yes.

8 Q. Were you running through the money that you had?

9 A. Yes. We started in New Zealand with 17,000. We left  
10 New Zealand with only about 7,000 left of that. We had been  
11 putting activities on credit cards and paying for it and we  
12 did some currency exchanges and paid rent and groceries with  
13 that money. We were spending that money that we had saved.

14 Q. Did you ultimately reinitiate contact with Mr. Shamo?

15 A. Yes.

16 Q. How did that come about?

17 A. I reached out to him in late March of 2016 and I said,  
18 hey, do you have the money that you owe me still? Have you  
19 been able to get that? First he mentioned, you know, no, I  
20 don't have it now. I should have it pretty soon. I kind of  
21 left it at that. We didn't speak for another couple weeks.  
22 I reached out to him again in early April and said, hey, I  
23 really need that money. He sent me \$2,400 at that point.  
24 He said I can get you another 7,600 or so to pay off a  
25 10,000 chunk in a couple weeks. He said that he had gotten

1 things rolling again or something and he finally had some  
2 money.

3 Q. Did you ultimately get that money then?

4 A. Yes, I did.

5 Q. You got about 10,000 in April and May of --

6 A. 2016, yes.

7 Q. In what form did you get that money?

8 A. I provided Aaron with a Bitcoin wallet address. I then  
9 transferred that money to a Bitcoin exchange called  
10 Bitstamp, which is a lot like a stock exchange. You can  
11 trade Bitcoins like they were commodities or stocks. So I  
12 took those Bitcoins and I sold portions of that on the  
13 exchange, and then from the exchange I made a wire transfer  
14 to my U.S. bank account.

15 Q. At that point did Mr. Shamo still owe you money?

16 A. Yes. He still owed me \$10,000.

17 Q. Of the 40,000 that you had agreed on --

18 A. Yes.

19 Q. -- he had paid you \$30,000?

20 A. Yes.

21 Q. You talked a little bit about these student loan  
22 payments and that that was your goal of working in this  
23 business to pay that off?

24 A. Yes.

25 Q. Yet you seem to have spent a lot of money on travel and

1 such. Tell us about the inconsistency of not paying off the  
2 student loans.

3 A. I was not sure where my money was going to come from  
4 and how much of it I would get in total, and so I put off  
5 paying those loans, because as soon as you pull them out of  
6 deferment, you owe money each month, and I don't want to run  
7 out of money and not have the ability to pay them again,  
8 because once you put them on deferment once, you are not  
9 able to again.

10 Then it also was the fact that I finally had money for  
11 the first time in three or four or five years and I wanted  
12 to not be drowning in debt and living paycheck to paycheck.  
13 I was reluctant to pay off my loans initially because I  
14 finally had some money to spend and I was not worried about  
15 it too much.

16 Q. Looking back, probably not the best use of your money?

17 A. No, not at all. It was probably the worst thing I  
18 could have done.

19 Q. That was April and May of 2016. Mr. Shamo had paid you  
20 \$10,000?

21 A. Yes.

22 Q. Are you still tight for money?

23 A. Sorry?

24 Q. Are you still a little tight for money?

25 A. Yes. At that point we were very tight for money. When

1 I received that 10,000, I did finally start paying on my  
2 student loans. I was paying \$500 a month, but I was  
3 calculating out what we were spending each month and what I  
4 was spending to pay off these loans and I realized our money  
5 wouldn't last forever. We were trying to find jobs on the  
6 north island. We had recently moved up to that area of the  
7 country. That is when we started house-sitting and looking  
8 for work in Auckland. But, yes, money was always a concern  
9 and it was always very tight.

10 Q. Around that time, May and June of 2016, was there more  
11 communication with Mr. Shamo about the business?

12 A. Yes. Aaron approached me and asked me to fly home and  
13 run the press for him for a week. He offered me \$50,000 to  
14 do so. I turned him down right away. I didn't want to  
15 leave the country. I knew that Sasha would have some major  
16 problems with it if I left. I knew that that would get me  
17 back into my old life and I didn't want any part of that. I  
18 initially said no to that.

19 Q. That is a ton of money. How did you resist that?

20 A. I just didn't want to get back into it and be  
21 physically back living with Aaron and be back in the United  
22 States and be around it. I wanted to separate myself from  
23 all of that.

24 Q. Mr. Shamo made that offer and you told him no, you  
25 didn't want to do that?



1 A. Yes.

2 Q. Any other discussions about the business?

3 A. We just made small talk. How are things going? I let  
4 him know that I was having trouble finding a job on a  
5 part-time basis in New Zealand and that money was getting  
6 tight and we were worried about that. I asked him for the  
7 final \$10,000. He said I don't have that, but you can come  
8 and work for me again and I will pay you that money.

9 Q. What was the proposal? What kind of work did he want  
10 you to do?

11 A. He wanted me to log on and perform customer service.  
12 So I would log on and answer messages for him. The messages  
13 that I would answer would be in relation to his daily drug  
14 sales. You know, someone needs a tracking number. Someone  
15 didn't get an order. That type of thing. He would pay me  
16 \$1,200 a week to perform those customer service duties.

17 Q. Were you familiar with customer service work?

18 A. No. I had never done it before. I had never logged on  
19 to any dark net web account. It was all new to me.

20 Q. Did you do any of that at eBay?

21 A. I did customer service at eBay, but, you know -- I was  
22 part of eBay's seller vetting group and fraud prevention, so  
23 I would review people that had been flagged and vet them as  
24 a seller and set appropriate selling limits, and any  
25 fraudulent activity that I noticed I would send over to the

1 back office teams to take care of.

2 Q. So not the same kind of customer service?

3 A. Not really. A little bit of the same, you know, just  
4 general customer service and you have got to talk to  
5 customers, you have got to, you know, be able to do that  
6 with ease. So I had that customer service background from  
7 my various jobs, but I had never done it before on the dark  
8 web.

9 Q. After having these discussions with Mr. Shamo about  
10 rejoining the drug trafficking operation, did you have a  
11 discussion with Ms. Grant?

12 A. Yes, I did.

13 Q. Tell us about that.

14 A. I told her -- you know, I was having trouble finding  
15 work. If we were going to house-sit, we had a better chance  
16 of getting these house-sits if I could work from home. I  
17 said, you know, Aaron still owes me 10,000 and he has  
18 offered me to perform customer service for him for a certain  
19 amount per week. You know, is this okay? Are you  
20 comfortable with this? She was not.

21 She told me not to do it. She said that she didn't  
22 feel right about it and that she was worried and scared.  
23 She told me she didn't feel safe when I kind of approached  
24 her with that. But she said ultimately it is your decision  
25 and you can make that. So I was pretty apprehensive about

1 doing it initially. I felt like Aaron owed me that 10,000  
2 without doing any work, but at the same time I talked myself  
3 into it. I told myself just doing customer service I will  
4 be safe and, you know, I won't have any physical contact  
5 with anything, and only Aaron will know what I am doing and  
6 I justified it for myself that way. I made a terrible  
7 mistake.

8 Q. What was the agreement as to what you were going to get  
9 paid?

10 A. \$1,200 every two weeks.

11 Q. Was there also hope that you would get that additional  
12 10,000 that was owed?

13 A. That 10,000 was kind of part of that weekly wage.  
14 Basically what it was was I don't have the 10,000 right away  
15 right now, but come work for me and you'll get that 10,000  
16 with just a little bit of work.

17 Q. So did you, in fact, agree to do that customer service  
18 work?

19 A. I did.

20 Q. How did you get that set up when you were in a foreign  
21 country?

22 A. Aaron gave me directions on which web site to go to to  
23 set up an e-mail account. I set up my own e-mail account,  
24 shortbread66. He sent me his P.G.P. information so I could  
25 decrypt the messages that he was sending to me and decrypt

1 the messages that his customers were sending to him in case  
2 I had to look up an order or something. So he provided me  
3 with a text file with log-in information and canned  
4 responses for customer service in P.G.P. keys.

5 Q. So you would log on your computer there wherever you  
6 were. Where were you at that time?

7 A. I was living in a house in Auckland, New Zealand, the  
8 capital city.

9 Q. This is customer service you can run from anywhere  
10 then?

11 A. Anywhere you have internet access.

12 Q. Did you have access to the entire dark web account that  
13 Mr. Shamo was running or limited access?

14 A. No. He gave me access to a secondary account that he  
15 had. In the AlphaBay system you can grant shared access to  
16 other accounts, and with that shared access you can allow  
17 other accounts to see your messages and your sales orders,  
18 but I never had access to wallets or making listings or  
19 anything -- any sort of administration of the account. I  
20 only had access to see the messages and to see the sales  
21 orders.

22 Q. What date did you start again working for this  
23 organization for Mr. Shamo?

24 A. Roughly July 1st of 2016.

25 Q. So you log on to this customer service account,

1 correct?

2 A. Yes.

3 Q. What do you see?

4 A. Not much of anything. When I logged on, I saw that  
5 Aaron had used that account for purchasing a few things, but  
6 there were no messages, no orders. I'm on the sidebar and  
7 the navigation of the account and you can click on shared  
8 access, and in there it shows what accounts you have been  
9 granted access to.

10 There are two buttons in there, one for messages and  
11 one for sales orders. I was able to click on both of those  
12 and that gave me access to his messages and sales orders on  
13 the main selling account, the Pharma-Master account.

14 Q. Did you then go through those messages?

15 A. Yes.

16 Q. Was there quite a stack at that time?

17 A. There was. There were 20 pages of backlog messages  
18 from a month back. I started going through them and went  
19 back maybe only two weeks or so and just ignored the rest  
20 and started answering what messages I could. Aaron had sent  
21 me through Telegram a bunch of shipping numbers, so then I  
22 could correlate the tracking number with the sales date and  
23 then the name that ordered it. So if someone needed their  
24 tracking number or wanted to know where their product was or  
25 if it got delivered I could sometimes look that up or

1 provide it for them.

2 Q. Was the site active at that time?

3 A. Yes.

4 Q. Is there something called vacation mode?

5 A. Yes. You can put the site -- not the site, but you can  
6 put the account into vacation mode. In vacation mode you're  
7 not able to sell anything, but you could still receive  
8 messages and still talk to people that have purchased from  
9 you previously, but it prevents all new sales from going  
10 through.

11 Q. Was the site in vacation mode a little bit while you  
12 got caught up?

13 A. I am not sure. There is no way for me to tell. I  
14 think Aaron was in vacation mode right before I started  
15 working for him, but I think once I started answering  
16 messages, he pulled it out of vacation mode so he could  
17 continue and make more sales.

18 Q. What e-mail did you use to receive communications or  
19 send communications to Mr. Shamo?

20 A. I used shortbread66.

21 Q. Was that new at that time or did that continue over  
22 from something that you were previously using?

23 A. That was new. I set that up at that time.

24 Q. That is on that encrypted e-mail system that you talked  
25 about?

1 A. Yes. The website was called Sigaint, S-i-g-a-i-n-t.

2 Q. You were shortbread66?

3 A. Yes.

4 Q. Do you know what Mr. Shamo was?

5 A. Americansteam.

6 Q. Did you also have communication with Ms. Bustin and Ms.  
7 Tonge on that encrypted website?

8 A. Yes. Later on, after, you know, people needed orders  
9 reshipped -- initially I sent those reshipments to Aaron to  
10 pass on to them, but sometimes he wouldn't respond to those  
11 very quickly, so I started e-mailing Katie and Alex directly  
12 with reshipments. Generally there would be one or two every  
13 couple of days that needed to be reshipped.

14 Q. Were there customer service issues that you were  
15 allowed to deal with yourself and others that you had to run  
16 through Mr. Shamo?

17 A. Yes. Aaron informed me that any issue less than \$500 I  
18 should just handle myself to my discretion and do what I  
19 need to do. Anything over that, what I would do is I would  
20 sticky the message, meaning that it stays at the top of your  
21 list of unread messages. Then I would send him a Telegram  
22 message with a quick little note. Here is the user name.  
23 This is what this guy needs. This is what he is having a  
24 problem with. Anything over a certain dollar amount Aaron  
25 would handle personally.

1 Q. How many messages would you handle then in this new  
2 customer service role of yours?

3 A. About 30 to 45 a day.

4 Q. What kinds of things?

5 A. You know, hey, I have not received my order yet. You  
6 know, can I get a tracking number? You know, if I order  
7 this on this date when should I expect it? You know, I  
8 didn't get the full amount that I ordered. I ordered 20  
9 pills and I only got 19.

10 Some people would ask for custom orders. I am \$5 short  
11 from ordering a package of 1,000. Can you cut me a special  
12 deal? Some people would complain about the quality. You  
13 know, these pills are breaking apart. I didn't feel  
14 anything from this. This didn't do anything for me.

15 Later on in the fall of 2016 people started complaining  
16 that they were getting sick. I took that to mean that they  
17 were like sick to their stomach and nauseous, that type of  
18 thing.

19 Q. How much communication would you have with Mr. Shamo  
20 while you were working this customer service job?

21 A. Two or three messages a day. I would just log on and  
22 take care of the messages and then send him a Telegram  
23 message after and say, you know, you're all caught up on  
24 messages. Here are your stickies. I would send one of  
25 those every day or so.



1 THE COURT: Pick a good stopping point for a  
2 break.

3 MR. STEJSKAL: This is as good as any.

4 THE COURT: We'll take our first break. We'll try  
5 to get going at about 10:30.

6 (WHEREUPON, the jury leaves the proceedings.)

7 THE COURT: We'll be in recess until about 10:30.  
8 Thank you.

9 (Recess)

10 THE COURT: Are you ready to go?

11 MR. STEJSKAL: Yes.

12 THE COURT: Let's go get the jury and proceed.  
13 You can stand or sit as you please until they start coming  
14 in.

15 (WHEREUPON, the jury enters the proceedings.)

16 THE COURT: You may proceed, Mr. Stejskal.

17 MR. STEJSKAL: Thank you, Your Honor.

18 BY MR. STEJSKAL

19 Q. So, Mr. Crandall, when we left off you had rejoined Mr.  
20 Shamo in this operation doing customer service in July of  
21 2016; is that correct?

22 A. Yes.

23 Q. And when you started back up, your first task was to  
24 catch up on all the old messages?

25 A. Yes.

1 Q. Were you seeing then as part of your customer service  
2 the customer orders?

3 A. Yes, some of them.

4 Q. Was there anything about the products in those customer  
5 orders that was different from when you were involved in the  
6 operation before you left the United States in the end of  
7 2015?

8 A. Yes.

9 Q. What was different?

10 A. Aaron had gotten rid of almost all of the products he  
11 was selling and he was selling exclusively Xanax and  
12 Oxycodone pills with Fentanyl instead of Oxycodone as the  
13 active ingredient.

14 Q. You were able to figure that out from the customer  
15 service orders?

16 A. Yes. A lot of the sales orders had the title of the  
17 listing, and one of those had the word Fentanyl in it, and  
18 the other two listings he had just had Oxycodone and then he  
19 had the Xanax listing.

20 Q. Before you had left the United States in 2015 you were  
21 involved in the pressing and selling of counterfeit Xanax,  
22 correct?

23 A. Yes.

24 Q. How about Fentanyl and Oxycodone?

25 A. No, not at all. He was not even selling any Oxycodone

1 or Fentanyl. In the last week of November of 2015 I know he  
2 was purchasing Oxycodone locally and giving it to the girls,  
3 but I never saw it and I was never a part of that. There  
4 was no Fentanyl ever involved before I had left the country.

5 Q. And no pressing of any Oxycodone or --

6 A. No, no pressing. He was just buying from a source  
7 locally and reselling it.

8 Q. Did you know that Mr. Shamo was involved in that prior  
9 to agreeing to do his customer service for him?

10 A. No, I had no idea.

11 Q. When you saw that on the customer service orders, what  
12 was your reaction?

13 A. I was a little apprehensive and scared. You know, back  
14 when Aaron and I were selling drugs when I was in Salt Lake,  
15 I always expressed some apprehension about selling opiates.  
16 I was scared. I was nervous of the consequences. It was a  
17 drug that I never felt comfortable with. So when I came  
18 back and started doing customer service, it scared me  
19 initially, but I thought at the time that I was just doing  
20 the customer service and I was very far removed from it, and  
21 I made that justification for myself that it was okay that I  
22 was back doing customer service for him, even though he was  
23 selling opiates and Fentanyl.

24 Q. So, again, some justification to yourself?

25 A. Yes.

1 Q. Tell us about the progression. Now we have gone  
2 from -- I believe you said you started with Adderall,  
3 correct?

4 A. Yes.

5 Q. And then moved into other things such as M.D.M.A. and  
6 L.S.D.?

7 A. Yes.

8 Q. Xanax?

9 A. Yes.

10 Q. Tell us how this progressed, how you moved from  
11 Adderall and now all the way to oxy.

12 A. It started out with Adderall. Hey, we'll make 300  
13 bucks a month, 400 bucks a month on the side. I mentioned  
14 to him that I would like to get my student loans paid off  
15 completely and be done. He started looking into other drugs  
16 and that is when G.H.B. was added. He said M.D.M.A. had a  
17 good profit margin so we started selling M.D.M.A.

18 Then about four or five months into this, based on the  
19 information that Aaron received from customer service and  
20 the orders, he realized that people wanted kind of a  
21 one-stop shop to get all of the drugs they want. That is  
22 when we started adding in L.S.D., magic mushrooms,  
23 marijuana, and he thought that the profit margins would be  
24 really high with cocaine. I pushed back on that initially.  
25 I didn't want to sell cocaine and I never felt comfortable

1 with it ever. It just scared me.

2 Q. What do you mean by you pushed back?

3 A. I told him why don't we just keep the M.D.M.A. If you  
4 want more profit, then sell more of it. Why can't we just  
5 stick with what we have and keep it where we are at?

6 Q. Were there other times that you pushed back?

7 A. Many times, yes. The cocaine was one of them. Buying  
8 the press was a time I pushed back. When Sasha was fired  
9 from her job I had to make the decision to push back very  
10 hard. Once I had tried to get out in September of 2015 I  
11 pushed back hard on doing anything for him, but he had his  
12 hands on the money and I had no other way to get it and I  
13 kind of was torn between trying to get what we agreed on and  
14 performing the errands and stuff for him.

15 Q. What do you mean by push back hard? Are you in fights  
16 with him?

17 A. Yes. I mean, when that cocaine package was seized and  
18 our roommate, Clancy, got called in by Homeland Security,  
19 Aaron and I had a big fight. We were yelling at each other.  
20 I told him, you know, this is what happens when you order  
21 cocaine. If Homeland Security had seized Ambien, I doubt  
22 they would have made such a fuss about this and, you know,  
23 you're putting our safety at risk. We're going to get  
24 arrested.

25 I was very scared, especially when, you know, Homeland

1 Security comes knocking -- it is not the Salt Lake City  
2 police. It scared me a lot and I pushed back hard on that  
3 and I told him this is why I never wanted to sell cocaine in  
4 the first place.

5 Q. When you had these disagreements, what kind of things  
6 would Mr. Shamo do to keep you in the organization?

7 A. He would just say if you quit now and you get out, you  
8 are not going to get the money you want. You know, you're  
9 basically forfeiting your profits in the business. He would  
10 say, look, it is okay. People want that one-stop shop.  
11 They are going to get it somewhere else. They are going to  
12 get it from someone else. It might as well be us. We might  
13 as well make money off of it. You're just sending a package  
14 to them. What does it matter what is in it?

15 Q. So each time you went along with it?

16 A. Yes.

17 Q. And then here we are in July of 2016 and you're seeing  
18 oxy and Fentanyl. Any push back at that time?

19 A. I didn't push back to him. I pushed back a little bit  
20 on myself and talked it over with Sasha. She didn't feel  
21 comfortable with it at all, but I made the decision to go  
22 through with it. It is something that I regret all the time  
23 now. It was the worse decision I have ever made. I don't  
24 know exactly why I could justify that in my mind, why it was  
25 okay when I pushed back so hard on it a year ago or seven

1 months ago. I just felt like I was in a financial pinch  
2 again and just needed the money and wanted to get that  
3 10,000 that we agreed on. I made some terrible  
4 justifications for myself.

5 Q. And money seemed to be the primary motivating factor?

6 A. Yes.

7 Q. How were you paid, then, once you started this customer  
8 service work in July of 2016?

9 A. Solely through Bitcoins. Aaron would send me Bitcoins  
10 and then I would figure out a way for me to get it back to  
11 my U.S. bank account.

12 Q. Where did you bank in the U.S.?

13 A. America First Credit Union.

14 Q. Tell us generally how that process would work, how you  
15 would get money from Bitcoin to your U.S. bank account?

16 A. I would send the Bitcoins to the Bitcoin exchange, kind  
17 of like the stock market. I would sell the Bitcoins that I  
18 needed on there. Then I would make a wire transfer from  
19 that Bitcoin exchange to my U.S. bank account. I believe  
20 that Bitstamp is the name of the company and I believe they  
21 are based out of London.

22 Q. Let's look at Exhibit 16.05.

23 Do you recognize that?

24 A. Yes.

25 Q. What is that?

1 A. That is a wire transfer from Bitstamp to my bank  
2 account.

3 Q. I'm looking for a date.

4 MR. SKORDAS: The fourth line. The fourth box.

5 BY MR. STEJSKAL

6 Q. Do you see a date on there?

7 A. Yes.

8 Q. I should ask you. What is the date on that?

9 A. It is April 19th, 2016.

10 Q. So that is earlier than you coming back into customer  
11 service, so what is this payment?

12 A. This is the first payment he has made me since I left  
13 the country. He paid me through Bitcoin and this is part of  
14 that 10,000 I got before I returned to doing customer  
15 service.

16 Q. Again, how does this work? How does the money get from  
17 Mr. Shamo to your America First bank account?

18 A. I provide him with a Bitcoin wallet address. He sends  
19 the Bitcons from his wallets through a tumbling service,  
20 which is meant to obfuscate where they come from and  
21 originate. So he sends them through the tumbling service  
22 and then they land in my wallet 20 or 30 minutes later.

23 Once they are in my wallet, I transfer them to a  
24 Bitstamp wallet, and then from that Bitstamp wallet I sell  
25 them from there and convert them into U.S. dollars. Then I



1 make a U.S. dollar bank transfer from Bitstamp to my bank  
2 account.

3 Q. Let's next look at 16.06.

4 Can you identify that for us, please?

5 A. Yes. This was on August 4th, 2016. This was partially  
6 some of the 10,000 that I received in April of 2016, and  
7 then the other portion of this is the wages I earned in July  
8 of 2016 by doing customer service. I didn't sell all the  
9 Bitcoins I received from Aaron initially, because sometimes  
10 the price of those Bitcoins will go up, and I didn't need  
11 the money right away and so I wanted a couple extra hundred  
12 dollars so I didn't sell all my Bitcoins immediately.

13 Q. What were you paid in wages?

14 A. In Bitcoins.

15 Q. How much money were you paid?

16 A. About \$2,400 a month.

17 Q. So you had some money previously paid by Mr. Shamo  
18 sitting in --

19 A. My Bitstamp account, yes.

20 Q. It is secure and it can just kind of sit there?

21 A. Yes.

22 Q. You were hoping it would appreciate?

23 A. Yes.

24 Q. So you just cashed some of that in with your wages and  
25 that is what we're looking at here?

1 A. Yes.

2 Q. What is our total amount here?

3 A. \$5,343.

4 Q. On the bottom here it says you are living at Murphys  
5 Lane. Were you living at Murphys Lane at that time?

6 A. No. I was in New Zealand at the time. I had not  
7 changed the address for my bank after I left the country, so  
8 my bank was still under the impression that I lived at  
9 Murphys Lane.

10 Q. This is your America First account?

11 A. Yes.

12 Q. How would you access money from that account?

13 A. They have an online portal. So I would log in to my  
14 account through America First -- I mostly paid my student  
15 loans through that. We would pay Sasha's credit card bill  
16 through my America First account.

17 Q. Let's next look at 16.07.

18 Can you identify that for us, please?

19 A. Yes. That is September 22nd, 2016, and it was for  
20 \$2,508.

21 Q. What was that for?

22 A. That was for my wages in August.

23 Q. Which you agreed on what?

24 A. 1,200 every two weeks. So in August there are a few  
25 more extra days, so there is 25, 50 roughly or --

1 Q. Same process here that Mr. Shamo would send it to you  
2 in Bitcoin and then you would get it into your account in  
3 this manner?

4 A. Yes.

5 Q. Let's next look at 16.09.

6 Do you see the date up there in the upper left-hand  
7 corner?

8 A. Yes. That is November 8th, 2016.

9 Q. Are you familiar with what happened on that date with  
10 regard to this photo?

11 A. Yes.

12 Q. Explain that for us.

13 A. So I had moved close to \$20,000 through my Bitstamp  
14 account that year and I was afraid of tax penalties and that  
15 type of thing, and law enforcement, so I asked Aaron to make  
16 a cash deposit into my account with the wages I earned in  
17 October. So in the first part of November he came and  
18 deposited roughly \$2,700 in my account.

19 Q. Directly into your America First account?

20 A. Yes.

21 Q. He is in Utah here still?

22 A. Yes.

23 Q. You're where?

24 A. I am in -- at that point I am in Australia.

25 Q. How did you became aware that you had that money in

1 your account?

2 A. I was able to log on to my America First account and  
3 see the deposit. He sent me a Telegram message saying the  
4 deposit was made.

5 Q. During this period then from July 1st of 2016 through  
6 November here of 2016, are you running this organization at  
7 all or are you more of an employee?

8 A. Absolutely not. I am definitely just an employee. The  
9 only thing I do is customer service and I have no hand in  
10 anything else.

11 Q. Are you paid a regular wage?

12 A. Yes.

13 Q. Did you have any say in how the company was run?

14 A. No, not at all.

15 Q. Let's go to 16.08.

16 Do you see the date up there in the upper left-hand  
17 corner?

18 A. November 22nd.

19 Q. You're ultimately familiar with that date, correct?

20 A. That is the date that Aaron was arrested.

21 Q. Do you know the circumstances surrounding this  
22 photograph?

23 A. Yes. I had a few Bitcoins left at that point. I had  
24 been notified by people here in Utah that Aaron had been  
25 arrested, so I started selling the rest of the Bitcoins that

1 I had and purging myself from all of that. I got onto  
2 localbitcoin.com and found some guy locally in Utah who was  
3 willing to do a cash deposit in exchange for the few  
4 Bitcoins I had left. He deposited roughly \$1,000 into my  
5 America First account and I transferred in the last of my  
6 Bitcoins.

7 Q. The transfer shows 900. Does that sound accurate?

8 A. Yes.

9 Q. Let's look at Exhibit 16.22.

10 THE CLERK: That one has not been offered as far  
11 as I know.

12 MR. STEJSKAL: I talked to Mr. Skordas this  
13 morning and --

14 THE CLERK: Okay.

15 MR. SKORDAS: Yes, that is fine.

16 THE COURT: Okay.

17 MR. STEJSKAL: I will have him identify it and  
18 then we will offer it here. Thank you.

19 MR. SKORDAS: We stipulate to its early admission.

20 THE COURT: 16.22 is admitted into evidence.

21 MR. STEJSKAL: Thank you, Your Honor.

22 (Plaintiff's Exhibit 16.22 was  
23 received into evidence.)

24 BY MR. STEJSKAL

25 Q. Now it is up on the screen, Mr. Crandall. Can you

1 identify that?

2 Let's leave the big document up here right now.

3 A. Let's see. That looks like a deposit into my --

4 Q. I am not talking about the yellow line now. I am  
5 sorry. Can you just identify the whole document?

6 A. That is my America First Credit Union account and the  
7 balance.

8 Q. It has kind of got a running total of the balance and  
9 the dates on the left?

10 A. Yes.

11 Q. Now let's focus on that yellow line.

12 A. That is a bank transfer from Bitstamp to my America  
13 First account.

14 Q. You see the date there, 4-19-16, on the left?

15 A. Yes.

16 Q. That was one that we previously removed to there as one  
17 of those Bitstamp transfers?

18 A. Yes.

19 Q. Let's go to the next yellow line.

20 Do you recognize this one?

21 A. Yes.

22 Q. What is that?

23 A. That is a bank transfer from Bitstamp to my America  
24 First account.

25 Q. That is, again, the one that we referred to that was

1 your July wages?

2 A. Yes.

3 Q. Plus some extra money that you --

4 A. Received in April.

5 Q. Okay. Let's go to the next yellow line. 9-22 of 2016.

6 Can you identify that one?

7 A. That is a deposit I made from Bitstamp to my America  
8 First account for August wages, \$2,500 -- \$2,508.

9 Q. I think there is one more yellow line.

10 Do you see a date on that one?

11 A. Yes. That was the 8th of November. That is the  
12 deposit that Aaron deposited into my account in the amount  
13 of \$2,700.

14 Q. That was the photograph of Mr. Shamo earlier we saw  
15 making that deposit?

16 A. Yes.

17 Q. And that corresponds to this deposit?

18 A. Yes.

19 Q. There is one more.

20 Can you identify that one by date?

21 A. Yes. That was on November 22nd in 2016. That was the  
22 deposit of \$900 from the person I found on localbitcoin to  
23 make that cash deposit into my account.

24 Q. Thank you.

25 How did you communicate with that person on

1 localbitcoin?

2 A. There is a way to send messages through the website.

3 He had an ad up that he was buying Bitcoins. I responded to  
4 it and said are you okay with doing a cash transfer -- cash  
5 deposit into my bank. We'll hold the Bitcoins in escrow,  
6 and then I will release the Bitcoins once you confirm the  
7 deposit in there.

8 Q. Did you specifically look for someone that was in Salt  
9 Lake or had access to America First?

10 A. Yes. America First is a local bank and so I had to  
11 make sure someone was in the Salt Lake area in order to do  
12 that.

13 Q. Did you have any communications with Mr. Shamo about  
14 your concerns with the Fentanyl and the oxy pills?

15 A. Yes. In October of 2016 Aaron went on vacation, so I  
16 was still answering a few messages but nothing new was being  
17 shipped out. Someone sent a message and said that they had  
18 gotten sick. Well, first they sent a message and said they  
19 didn't receive their order and it was for 40,000 pills, so  
20 it was quite a large order. I referred Aaron to it and he  
21 said just reship it.

22 It was reshipped at a later date. Then they came back  
23 and said that they had gotten sick and -- no. I am sorry.  
24 They came back initially and said they didn't receive the  
25 product. I looked up the tracking number and saw that it



1 had been delivered and even the first one had been  
2 delivered, too. I told them that. I said, look, the  
3 tracking shows delivery. They came back and said someone is  
4 getting sick and my friend overdosed.

5 So I immediately messaged Aaron and said, hey, this is  
6 a really serious problem. Someone is saying they overdosed.  
7 Like, what do we do? You need to handle this. I started  
8 freaking out and I was very, very scared at that point.  
9 That was the first time I had ever heard of any overdose or  
10 anything and it just freaked me out. I refused to log in  
11 for quite a few days after that and just kind of left it to  
12 Aaron. I figured that was a big issue that he has to deal  
13 with rather than a small thing that I can take care of.

14 Q. How did he handle that?

15 A. Initially he was going to look at obituary records in  
16 the area. I don't know if that was ever looked into or not.

17 A few days later or about a week later or so, the  
18 person who purchased the pills created a dispute online,  
19 disputing that transaction. At that point an administrator  
20 has to get involved and you are kind of forced into taking  
21 care of that. So I told Aaron to look into it. I gave him  
22 some more details and told him, you know, the first shipment  
23 the tracking shows delivered, the second one shows  
24 delivered.

25 Aaron responded to me the next day and said I bet this

1     guy is just faking it. It looks like he is just trying to  
2     scam us. I can't confirm that someone died, but, you know,  
3     he refused to reship it because we have a confirmed tracking  
4     number. He didn't really say much about the overdose at all  
5     or didn't seem to care about it.

6     Q.    When you were involved with the pill press at the end  
7     of 2015 before you left the country, you talked previously  
8     about mixing the stuff in Mason jars?

9     A.    Uh-huh.

10    Q.    Do you have concerns that now that Mr. Shamo is dealing  
11    with Fentanyl and oxy, that that was not a good method?

12    A.    Yes.

13    Q.    Did you have communication with Mr. Shamo about that?

14    A.    Yes. People would always ask, you know, what is the  
15    ratio of active ingredient to filler. Aaron gave me just a  
16    canned response to give to people when they asked for that  
17    that says we don't discuss our formula with anybody, but  
18    they are pressed to mimic a 30-milligram Oxycodone. So  
19    those were the answers I would give back to the customers.

20           Some people would complain that they were getting sick  
21    occasionally. I asked Aaron about it and I said, you know,  
22    what would be causing this do you think? What is going on?  
23    I was assuming this meant that people were getting nauseous  
24    and upset stomachs. I asked him, you know, are you mixing  
25    it long enough? Is everything getting mixed up properly?

1 He told me he had professional mixing equipment at that  
2 point. So that kind of alleviated my concerns and I didn't  
3 really worry about it too much after that.

4 Q. Was there any professional mixing equipment before you  
5 left the country?

6 A. No. It was all done by hand.

7 Q. I am going to show you Exhibit 13.09. Yes. Photo 19.  
8 Do you recognize that?

9 A. I do not. I have never seen that before.

10 Q. So the conversation that you just relayed about  
11 somebody overdosing and dealing with that on customer  
12 service, that was in the fall of 2016?

13 A. Yes.

14 Q. You said there were other messages or customer service  
15 issues dealing with those kind of issues?

16 A. No one ever mentioned an overdose. They would just say  
17 that people were getting sick. Occasionally someone would  
18 say that the pills were very strong. I relayed that to  
19 Aaron, and Aaron told me that Fentanyl tolerance and opioid  
20 tolerance is a little different. If someone is really  
21 tolerant to opioids and then they take a Fentanyl pill,  
22 sometimes it can affect them a little bit harder than it  
23 would with the same amount of opiates. People would say  
24 that occasionally, you know, that this one was really strong  
25 or that type of thing, but there wasn't really much I could

1 do in terms of customer service. I would always message  
2 Aaron and say, hey, someone is complaining about being sick  
3 or not feeling well. Make sure that you keep mixing  
4 everything.

5 Q. Did you communicate with Mr. Shamo over Telegram?

6 A. Yes.

7 Q. That was one of your ways of communication?

8 A. Yes.

9 Q. And the other one was over that --

10 A. Encrypted e-mail.

11 Q. If you just had things to chat about --

12 A. Telegram.

13 Q. -- which form would you use?

14 A. The only thing we used the e-mail for was to send -- so  
15 when I would send a reshipment e-mail to Katie and Alex, I  
16 would c.c. Aaron on that e-mail. That is really the only  
17 way I would use the e-mail to communicate with him.

18 Everything else was through Telegram.

19 Q. Telegram messages were encrypted, correct?

20 A. Correct.

21 Q. They could also be erased off of phones or whatever  
22 other devices that were being accessed?

23 A. Yes.

24 Q. But they were not always erased, correct?

25 A. Not always. It depends on your settings and how you

1 set up the chat.

2 Q. Let's look at Exhibit 14.12.

3 Do you recognize this first page here?

4 A. Yes. This is a Telegram message between me and Aaron.

5 Q. Do you see the date on that? I guess the dates are not  
6 on here. Down in the messages. Sorry.

7 A. Yes. The first message was sent on the 10th of  
8 November in 2016.

9 Q. Let's scroll down a little bit. Do you see under the  
10 picture where it says Drew new phone?

11 MR. STEJSKAL: Let's not go there yet, Ms. Lauder.

12 BY MR. STEJSKAL

13 Q. Do you see that in small print where it says Drew, new  
14 phone?

15 A. Yes.

16 Q. Did you get a new phone around this time?

17 A. I got a new phone number, because when I left the  
18 country, I had to get a New Zealand phone number. So I  
19 think that that was what Aaron had for his contact name in  
20 his phone for me is Drew, new phone.

21 Q. He named that as a new phone?

22 A. That is what he just named the contact.

23 Q. Up there, and we're looking at the top photograph, is  
24 that you?

25 A. Yes, that is.

1 Q. We have heard some other people say that you're smart  
2 and Mr. Shamo is not so much. This does not look too smart.  
3 What are you doing here?

4 A. I am sitting with a tiger. I am in Thailand.

5 Q. I don't see a fence around that tiger.

6 A. No. It was very scary. There was a tourist attraction  
7 in Thailand where you could go in the cage with the tigers.  
8 You have a couple of trainers around you, but you're able to  
9 go in and pet them and take pictures while you do.

10 Q. That still does not seem too smart. You were  
11 comfortable with it?

12 A. It was very nerve racking. But, I mean, yeah, I had  
13 seen so many people do it the rest of the day and before me,  
14 so I figured if all these other tourists are doing it, it is  
15 okay.

16 Q. You don't want to be that one.

17 Let's scroll down to the messages. Is this how you  
18 would communicate with Mr. Shamo then?

19 A. Yes.

20 Q. Since this is Drew, new phone, Crandall, is this off of  
21 his phone?

22 A. Yes. These are messages on his phone.

23 Q. What is the white box here? Who is sending this  
24 message to whom?

25 A. These are messages that I sent to Aaron. In the white

1 box is me and the green box later on is going to be Aaron's  
2 response.

3 Q. Here looking at this screen, walk me through this brief  
4 conversation.

5 A. So on the 16th of November I was trying to do some  
6 customer service work from Thailand. All I needed was my  
7 computer and internet access. At 7:00 a.m. Utah time, and I  
8 am not exactly sure how the time change worked, but I was  
9 trying to answer messages so I sent Aaron a message and said  
10 is the website down, meaning AlphaBay? I said it won't load  
11 for me. Then I tried a different U.R.L. and that worked.  
12 There is about five or six different U.R.L.s you can use to  
13 get to the same site, and so I just tried a different one  
14 right after and it worked.

15 Q. So you got in apparently?

16 A. Yes.

17 Q. Let's go to the next one. Follow us through on this  
18 conversation here at the top.

19 A. So on the 16th of November, after I was finished  
20 performing customer service I sent a message and said, hey,  
21 I'm all caught up on messages. Apparently he was in  
22 vacation mode at that time, because the next day I asked him  
23 are you live again? He said, yeah, we went live last night.  
24 That was on the 17th of November.

25 Q. Okay. Tell us again what vacation mode is.

1 A. It is where you can't generate any new sales but you  
2 can still process old, previous sales and answer messages.  
3 Sometimes Aaron would take a weekend off or a day off and he  
4 wouldn't have any new orders come in, but still people would  
5 send messages and so I still had to do customer service to  
6 keep up on that.

7 Q. Did you have any control over putting that in vacation  
8 mode?

9 A. No, not at all.

10 Q. Who did?

11 A. Aaron did.

12 Q. Let's go to the white box.

13 The green box is there. Who is that saying we went  
14 live again last night?

15 A. That is Aaron.

16 Q. Let's go to the boxes under that. Make that larger,  
17 please.

18 Read that top one for us.

19 A. So on the 18th of November I said I am getting  
20 complaints about the last batch of in boxes, which was the  
21 name of one of his listings, and from before vacation mode  
22 that are making people sick. I'm only halfway through the  
23 messages and I already have four people saying stuff about  
24 it. Should I just tell them to suck it up? Should we  
25 reship 50 percent? Reship 50 percent means if they ordered



1 100 we will reship 50 of them.

2 Q. Now, should I tell them to suck it up sounds a little  
3 callus. What are you thinking there?

4 A. I am absolutely ashamed that I ever said that. I read  
5 that now and I can't believe I would say that to somebody.  
6 It is horrible. It is terrible to say to somebody. I can't  
7 believe I would have done something like that but, you know,  
8 it is there and I said it.

9 Q. Now, that last line, should I just tell them or should  
10 we reship 50 percent, you're asking that question to Mr.  
11 Shamo?

12 A. Yes.

13 Q. Why are you asking him as opposed to taking care of it  
14 yourself?

15 A. Because there is a lot of orders there and a lot of  
16 those orders were large quantities, and so I just wanted to  
17 get confirmation from him, you know, is this something that  
18 we're not going to do anything about? Is this something  
19 that I can send a message to Katie and Alex and have them  
20 reship some of this? I am getting his permission to deal  
21 with these whichever way he wants to.

22 Q. You are not allowed to deal with this without his  
23 permission?

24 A. Again, these orders must have been over \$500  
25 collectively, and so I had to kind of forward that over to

1 Aaron. Anything less than 500 I was just taking care of,  
2 but anything over that I had to talk to Aaron and okay it  
3 with him.

4 Q. That was the standing agreement throughout your  
5 customer service work --

6 A. Yes.

7 Q. -- that anything over 500, Mr. Shamo was in charge?

8 A. Yes.

9 Q. Do you know pill-wise what these were selling for?

10 A. It depends on the quantity, but in single quantities I  
11 believe each pill was about \$10. Then in larger quantities,  
12 10,000 or more, I think it was one dollar or two a pill.

13 Q. It wouldn't take a whole lot to get over that \$500  
14 threshold, right?

15 A. No.

16 Q. At this time what size of orders were you guys sending  
17 based on your customer service feedback?

18 A. There was a lot. Sometimes one or two pills.  
19 Sometimes ten. A lot of people would order hundreds. Very  
20 rarely you would get orders for 10,000 or so at a time,  
21 5,000, sometimes people would make orders upwards of 20,000  
22 pills.

23 Q. That next box does not really say much, I guess.

24 The second message down there is all caught up. What  
25 is that?

1 A. So on the 18th I had caught up on all of the messages  
2 that were in the account. And then right below that I send  
3 him a message saying there are three sticky messages. These  
4 are messages that people want to talk to Aaron specifically  
5 about a special order or something like that. None of them  
6 were really disputes and so I just said you have three  
7 stickies that need your attention. Nothing major.

8 Q. Those are things that Mr. Shamo has to take care of  
9 himself as the guy running this as opposed to something that  
10 you can take care of?

11 A. Yes. These are people asking for like a custom order.  
12 Hey, I have enough to buy 33,000 pills and not 40,000. Can  
13 you set up a custom order for me or cut me a custom deal,  
14 something like that? These are just things that I don't  
15 have any control over. I can't set up new listings or  
16 anything like that, and so I just pass them on to Aaron to  
17 deal with.

18 Q. Let's go down to the next page. Make the green boxes  
19 big, if you would.

20 What do we see in that first one?

21 A. So he responded back to my message where I said I'm all  
22 caught up, and he responded back to the question I had  
23 where, you know, should I just tell them to suck it up or  
24 should we reship half of those pills to those people? Then  
25 he said just give a pill count so we can keep track of how

1 many extra pills he is sending out. And then --

2 Q. Let's stop there. What do you mean by a recount?

3 A. Say if someone ordered 1,000 pills and we are going to  
4 reship half of them, we are going to ship them out 500, so I  
5 just keep a tally of how many are getting reshipped and let  
6 him know.

7 Q. So he knows how many pills are going out?

8 A. Yes.

9 Q. Go ahead with that next line.

10 A. He was asked if I had heard from Sean recently. I had  
11 not been conversing with Sean at all. He said Sean is my  
12 runner for mail. I have not heard a response from him since  
13 yesterday. You know, if you still talk to him, can you  
14 reach out and see if he is okay?

15 Q. Who is this Sean we are talking about here?

16 A. Sean Gygi.

17 Q. You knew him but you just hadn't talked to him for a  
18 while.

19 A. Yes.

20 Q. Looking at the date there that these messages are being  
21 exchanged between you and Mr. Shamo, 11-18 of 2016, does  
22 that mean anything to you based on what you now know?

23 A. Yes. Based on not I now know Sean had been approached  
24 by Homeland Security agents and he was becoming a criminal  
25 informant at that point. He was handing the packages over

1 to Homeland Security instead of sending them out and he was  
2 meeting with Aaron and wearing a wire.

3 Q. That lines up with this message here time-wise?

4 A. Yes.

5 Q. How about that last line on that big message there?

6 A. So he basically is saying that in the listings he is  
7 switching over to bulk purchases only.

8 Q. Read that for us first.

9 A. We are also slowly moving to bulk, so I'm pulling  
10 listings with a ten quantity and listings with a 100  
11 quantity for Xanax to slowly move up.

12 Q. Now, tell us what that means.

13 A. Instead of selling the Xanax 10 at a time or 100 at a  
14 time, he wanted to move up to 500 or 1,000 at a time or  
15 more.

16 Q. This seems to be a statement rather than a question.  
17 Is he asking you if you want to do this or is he telling you  
18 that that is what you're going to do?

19 A. It is more just of an F.Y.I. You won't see listings  
20 for ten or 100 anymore.

21 Q. Who makes these major business decisions?

22 A. Aaron does.

23 Q. Let's next look at Exhibit 15.05 and page 5 of that.

24 Do you recognize this?

25 A. Yes. This is an e-mail that I sent to Katie and Alex

1 as well as Aaron, and this has some reshipment information  
2 that is encrypted and it is attached as a text file.

3 Q. Shortbread66 --

4 A. That is me.

5 Q. -- and passthepeas --

6 A. That is Katie and Alex.

7 Q. -- and americansteam?

8 A. That is Aaron.

9 Q. The subject is reship. So you're doing what now?

10 A. After I have done the messages that were, you know, a  
11 few orders that needed to be reshipped, so I put the plain  
12 text information of what needs to be reshipped and what  
13 address it is going to, and I ran it through the encryption  
14 program and then pasted two versions of it into text files.  
15 The first attachment is to Katie and Alex and it is  
16 encrypted with their P.G.P. key. That is the 11-20 P2P  
17 T.X.T. The second one is sent to Aaron and that's the 11-20  
18 Pharma. That just has the same information that I sent to  
19 Katie and Alex, but it is encrypted so only he can read it.

20 Q. This series of letters and numbers at the bottom, that  
21 is just the encryption itself?

22 A. Yes. That is the message once it has been encrypted.  
23 It is just a random string of characters.

24 Q. So you're sending just the reship information. This is  
25 not the daily orders, this is just your customer service

1 reship?

2 A. Yes. This is just reshipments, not the daily orders.

3 Q. That was November 20th of 2016 and November 18th and  
4 leading up to that. Now let's talk about November 22nd of  
5 2016.

6 What happened that day?

7 A. Sasha and I had arrived in the capital of Laos that  
8 day, riding a bus overnight and it was about 7:00 or 8:00  
9 p.m. that night. We had a mutual friend, Crystelle Madson,  
10 reach out to us on Facebook. She sent us the K.S.L. news  
11 article about Aaron being arrested. I had previously,  
12 earlier that night, been trying to log on to answer messages  
13 and take care of things and I couldn't get in. The internet  
14 where we were at was very unreliable and I couldn't get a  
15 solid connection.

16 No one was responding to messages and when that came up  
17 and Crystelle sent us that message, we both started crying  
18 and freaking out. Immediately I was very, very scared. I  
19 went out and purchased some more data for my phone so I  
20 could set up a mobile hot spot so I could actually log on to  
21 the account.

22 I immediately logged in to the account and started  
23 deleting messages, deleting anything that I could. Again, I  
24 only had access to the messages and that was it. I opened  
25 up one dispute with someone and that also had an

1 administrator added into the dispute process, and I sent a  
2 private message to the administrator and said this account  
3 has been compromised by law enforcement, please shut down  
4 the account. I was trying to cover my tracks and delete any  
5 evidence that I was in there and any messages I had sent.  
6 After that was all done --

7 Q. That was the administrator of AlphaBay, whoever runs  
8 the --

9 A. Just any administrator. Anytime you open up a dispute  
10 on AlphaBay as a customer it creates a three-party  
11 discussion where the seller and the buyer and some  
12 administrator from AlphaBay can come in and mediate that  
13 dispute. I went into a recent one and found an  
14 administrator and just sent them a personal message based on  
15 their user name.

16 Q. You told them to shut Mr. Shamo's particular sale site  
17 down?

18 A. Yes.

19 Q. The Pharma-Master site?

20 A. Yes.

21 Q. Then what?

22 A. After I had deleted all of the messages and told them  
23 to shut the site down, I logged out. I stored everything  
24 related to the customer service and the business on a little  
25 flash drive. I took that flash drive and destroyed it,



1     threw it down the storm drain in Laos and just completely  
2     destroyed it. Then after that I reformatted my computer and  
3     deleted everything and reinstalled my operating system.

4     Q.    I believe that was the same day you cashed in most of  
5     the remainder of your Bitcoin?

6     A.    Yep.

7     Q.    Just to clear that out as well?

8     A.    Yes. Just to get rid of everything. I knew it was  
9     over and there was nothing more to it, and so I just wanted  
10    to get rid of all evidence and get rid of everything that  
11    connected me to this and just completely stop it.

12    Q.    Then after that did you talk to family or friends or  
13    people in the United States?

14    A.    Yes. So I first initially reached out to Sean Gygi and  
15    asked him if he was okay. At that point I didn't know what  
16    his role was in this or what he was doing. I had that  
17    message from Aaron that said he was a mail runner. I didn't  
18    know exactly what that meant or if he was still a drop at  
19    all, so I just asked him if he was okay.

20           Sean Gygi said, yeah, I am fine. No big deal. To me  
21    it kind of sounded like things were okay. I reached out  
22    also to Dan Allen, a mutual friend, and I just said, holy  
23    crap. Have you seen the news? This is crazy. I was kind  
24    of hoping Dan would give me some more information, but he  
25    just kind of said, yeah, this is nuts and left it at that.

1 And then Sasha reached out to Mario Noble to ask him if  
2 he was okay or he had been arrested and he was very vague as  
3 well and didn't say anything.

4 Q. Did you give any instructions to your family about what  
5 to do?

6 A. No. My family had no idea that I was doing this. I  
7 kept them completely in the dark the whole time. I was  
8 partially trying to protect them. I was ashamed of what I  
9 was doing. I was doing something illegal for money and I am  
10 not proud of it. I didn't want my family to know at all.

11 A couple weeks after Aaron was arrested, though, I did  
12 reach out to my parents and I sent them the news article  
13 from K.S.L. and said I don't know if you have seen this, but  
14 Aaron has been arrested and these are pretty serious  
15 charges. I was his roommate and his friend for a long time  
16 so if the police want to talk to me, you know, let them know  
17 that I'm out of the country. Give them my e-mail address.  
18 Give them my phone number and I will talk to them. We even  
19 had a video chat about that and they kind of reassured me  
20 that everything is going to be okay. We'll forward law  
21 enforcement over to you if it comes to that, but no one has  
22 reached out to you. I kind of left it at that. I didn't  
23 want to let my parents know anything further, but I kind of  
24 let them know that I am available to talk to if someone  
25 comes knocking on their door looking for me.

1 Q. To your knowledge did anyone do that from law  
2 enforcement?

3 A. No, no one ever did.

4 Q. You're still in Laos?

5 A. Yes.

6 Q. Then what do you do?

7 A. Well, a lot of our travel arrangements and plans were  
8 already set up and paid for in advance so we continued along  
9 our travels. In January we were in Indonesia. We decided  
10 back in September of 2016 that we really enjoyed traveling  
11 and we wanted to keep that going, and so Australia offers  
12 the same type of visa that New Zealand does. We signed up  
13 for a one-year work visa in Australia.

14 Our plan after our Southeast Asia backpacking trip was  
15 to go to Australia after that and live there for a year. So  
16 in the first part of January when we finally left Indonesia,  
17 we landed in Brisbane, Australia and we started working  
18 there and living there.

19 Q. Were you guys worried about this investigation still?

20 A. Yes. Sasha and I had gotten engaged when we were in  
21 Thailand, and so we were trying to set a date for our  
22 wedding and figure that all out. We talked about it and  
23 said, you know, if someone is going to come asking about  
24 this or want to talk to me, it is going to happen within the  
25 first couple of months. So we kind of set a date as

1 January 10th. If no one talks to us from -- maybe it was  
2 the 20th. Maybe it was two months after Aaron had been  
3 arrested. We said if no one talks to us by January 20th,  
4 let's go ahead and set an official date for our wedding and  
5 have people start planning on attending and booking their  
6 tickets and stuff. So we were on the lookout and kind of  
7 looking at news stories and keeping tabs on that during that  
8 time, but no one ever reached out to us, so January 20th  
9 came and went and we planned our wedding after that.

10 Q. Where did you plan to get married?

11 A. We planned to meet our families in Hawaii and get  
12 married on May 12, 2017. So we started booking plane  
13 tickets and buying a dress and buying a ring and all of that  
14 and started setting that all up.

15 Q. You sent out invitations and your family made  
16 arrangements and all of that?

17 A. Yes. All my family were attending and a lot of her  
18 family were too. We had 45 people that were flying out to  
19 Hawaii to meet us for our wedding. We were going to fly  
20 from Australia and meet our families there.

21 Q. Did you guys end up flying from Australia to Hawaii?

22 A. We did. We flew out of Australia on May 5th and then  
23 when I landed in Hawaii, I was arrested that morning coming  
24 through customs.

25 Q. Right off the airplane?

1 A. Yes.

2 Q. And they confiscated any electronic equipment that you  
3 had with you?

4 A. Yes. They confiscated my phone, my computer, all the  
5 cameras I had. They confiscated my passport. They  
6 confiscated Sasha's passport and her phone and her computer  
7 and they confiscated every electronic device that we had.

8 Q. And pulled you in a room and started questioning you?

9 A. Yes. They separated us and they ran a search through  
10 all of my bags and the same with hers. They pulled me into  
11 a room at Homeland Security and started questioning me.

12 They pulled Sasha into a separate room and started  
13 questioning her. The interrogation lasted an hour or two.

14 Q. And you initially lied to investigators, correct?

15 A. Yes. Initially they were just making small talk asking  
16 what I was doing, where I was traveling, but when they  
17 started asking about financial information and about  
18 Bitcoins I started freaking out and I lied to investigators.  
19 I was really scared and I didn't like where their  
20 questioning was going and I didn't want to incriminate  
21 myself. I didn't have a lawyer present or anything and so,  
22 you know, part of my Miranda rights is I have the right to  
23 remain silent so I lied to them first and then they kept  
24 pressing the matter, and so I finally asked for a lawyer and  
25 decided to just be quiet.

1 Q. And you have been in custody ever since?

2 A. Yes.

3 Q. You were returned to Utah by the United States  
4 marshals, correct?

5 A. Yes.

6 Q. You then hired and talked with an attorney here?

7 A. Yes.

8 Q. And after that you submitted to more interviews with  
9 law enforcement, correct?

10 A. Yes, I did.

11 Q. Let's look at Exhibit 23.01.

12 Do you recognize that?

13 A. Yes.

14 Q. What is that?

15 A. That is my plea agreement that I signed on October 17th  
16 of last year.

17 Q. And in that did you agree to plead guilty to every  
18 count you were charged with?

19 A. Yes.

20 Q. That was with the advice of your attorney?

21 A. Yes.

22 Q. Was there any specific sentencing agreement that the  
23 United States promised to you?

24 A. No.

25 Q. Did you also sign a cooperation agreement?

1 A. Yes, I did.

2 Q. Let's scroll to that, the last few pages.

3 Looking at the bottom of that, it says you agree to  
4 testify truthfully and completely for the United States in  
5 any subsequent court hearing or trial.

6 Did you agree to that?

7 A. Yes.

8 Q. And you agreed to wait to be sentenced until after the  
9 trial, correct?

10 A. Yes.

11 Q. Have you testified truthfully and completely?

12 A. Yes.

13 Q. Was it your hope as a result of testifying and  
14 cooperating that the judge may be more lenient on you?

15 A. Yes.

16 Q. Any specific promise as to what is going to happen?

17 A. No.

18 Q. Let's go back to the top and look at the second  
19 paragraph with the charges.

20 It says you agree to plead guilty to counts two, three  
21 and 13; is that correct?

22 A. Yes.

23 Q. And count two is conspiracy to distribute Fentanyl,  
24 correct?

25 A. Yes.

1 Q. Did you do that?

2 A. Yes, I did.

3 Q. What was your role in that?

4 A. My role in that was customer service. I provided  
5 customer service for all of the sales on the dark web and I  
6 was paid for it biweekly.

7 Q. Let's scroll down and look at the next count.

8 You also pled guilty to count three, conspiracy to  
9 distribute Alprazolam?

10 A. Yes.

11 Q. By that they mean --

12 A. Xanax.

13 Q. -- counterfeit Xanax?

14 A. Yes.

15 Q. Did you do that?

16 A. Yes, I did.

17 Q. Count 13, conspiracy to commit money laundering.

18 Did you plead guilty to that?

19 A. Yes, I did.

20 Q. Did you do that?

21 A. Yes.

22 Q. That is because the money you were dealing with was  
23 from --

24 A. Illegal proceeds, and I converted it into real currency  
25 and used it for everything.



1 Q. Some of the proceeds -- some of it was your wages?

2 A. Yes.

3 Q. You were not charged with distribution resulting in  
4 death, correct?

5 A. Correct.

6 Q. You're aware that Mr. Shamo is charged with that and  
7 that that occurred in June of 2016?

8 A. Yes.

9 Q. Were you involved in this drug trafficking organization  
10 in June of 2016?

11 A. I was not.

12 Q. You got back in when?

13 A. July 1st, 2016.

14 Q. Were you aware at that time that someone had died as a  
15 result of this operation?

16 A. I had no idea.

17 Q. Were you told that your job is to tell the truth?

18 A. Yes.

19 Q. Were you told that you could harm yourself if you're  
20 telling lies and untruths?

21 A. Yes.

22 Q. Did you tell the truth here with us today?

23 A. Yes, I did.

24 Q. Do you have any stake in the outcome of these  
25 proceedings? Does it matter what you get on what happens

1 here?

2 A. I'm sorry. One more time?

3 Q. That was a poorly worded question. Let me try that  
4 again.

5 Does your cooperation depend on whether Mr. Shamo is  
6 found guilty or not guilty?

7 A. No.

8 Q. All you were told is to tell the truth?

9 A. Yes.

10 Q. Will you get sentenced after this trial is over?

11 A. Yes.

12 Q. And you expect that there is a sentence coming?

13 A. Yes.

14 Q. You have been in jail now for how long?

15 A. 27 months and nine days.

16 Q. And you still have plans to marry Ms. Crandall?

17 A. Yes.

18 Q. She is standing by you?

19 A. Yes.

20 Q. That is going to happen after accepting whatever  
21 sentence Judge Kimball hands down?

22 A. Yes.

23 Q. I joked earlier about you and the tiger in that picture  
24 and others have said that you're smart and Mr. Shamo is not  
25 that smart, and, therefore, you must be the brains behind

1 this operation. You have known Mr. Shamo for how long?

2 A. 2008 or so.

3 Q. How do you respond to that, that others say that he is  
4 not too smart?

5 A. It is pretty easy to Google things and do a little bit  
6 of research. You know, it is not that hard and there are  
7 websites out there with a plethora of information that you  
8 can just do 30 minutes of research and figure out how to do  
9 this.

10 Q. So he did some of these things to set up the  
11 organization?

12 A. Yes.

13 Q. Let's pare that down a little bit. Let's talk about  
14 what you did as part of the organization. At the beginning  
15 did you and Mr. Shamo discuss getting involved in this type  
16 of activity?

17 A. We did.

18 Q. And did you both agree to start selling Adderall and  
19 get involved?

20 A. Yes.

21 Q. Did you guys become partners?

22 A. Yes. I had a one-third partnership and he, you know,  
23 had a two-thirds stake in it, but at the same time he had  
24 almost all of the decision making capabilities. I didn't  
25 choose what to order or anything like that or how to set

1 this up. He had control of the money the whole time. I  
2 never once had access to the wallets. I trusted him enough  
3 that he would just pay me fairly based on our one-third,  
4 two-thirds agreement.

5 Q. You packaged and shipped drugs?

6 A. Yes.

7 Q. Knowing that they were illegal drugs?

8 A. Yes.

9 Q. You helped recruit some others as drops?

10 A. Yes.

11 Q. You helped put together the recipe, for lack of a  
12 better term, to make these counterfeit Xanax with  
13 Alprazolam?

14 A. No. Aaron came to me with the recipe. I sat at the  
15 machine and did the algebraic ratio math to make sure it was  
16 going to come out correct, but he came to me with the  
17 recipe.

18 Q. I see. So he had the active ingredients and the --

19 A. He came to me with what he wanted. He said I want a  
20 three milligram pill and here is the mold and here is the  
21 active ingredients and the filler.

22 Q. When you left the company you got paid out some?

23 A. Yes.

24 Q. And expected more or hoped for more?

25 A. Yes.

1 Q. And then in July of 2016 you got back into customer  
2 service?

3 A. Yes.

4 Q. Who was in charge of the organization?

5 A. Aaron Shamo.

6 Q. From the beginning?

7 A. Yes.

8 Q. In the beginning with your partnership, did you have  
9 some decision making capacity?

10 A. When it came to shipping products and that type of  
11 thing, yes, but I would also receive feedback from him.  
12 Aaron would say, hey, this got damaged in shipping. Can we  
13 add some kind of bubble wrap to it? You know, can you put  
14 it in a Mylar bag to conceal it better? Can you -- the term  
15 that they use on the dark net is stealth. Can you add more  
16 stealth to the package, meaning, you know, put it in a candy  
17 bar wrapper or put it in a stuffed toy? So I kind of had  
18 some leeway in how to do that, but Aaron would come to me  
19 with suggestions and just let me implement that on my own.

20 Q. Once you left the country, how much direction did you  
21 have over the organization?

22 A. None.

23 Q. Did that ever change?

24 A. No.

25 Q. So what kinds of things did Mr. Shamo do that you

1 didn't do?

2 A. He was in charge of ordering new products, ordering all  
3 products. He was in charge of decrypting every daily order  
4 and sending that to either me or to Katie and Alex later on.  
5 He was handling all of the money. Initially all the money  
6 was kept in a lockbox that I never had a key too. It was  
7 always in his room with the drugs. Aaron had control over  
8 all of that.

9 Q. Who listed what was sold?

10 A. Aaron did.

11 Q. Who determined how much to charge customers?

12 A. Aaron did.

13 Q. Who paid the other employees in this organization?

14 A. For the most part that was Aaron, but occasionally I  
15 would send money to other drops. When I would pick up a  
16 package I would give them \$50 or I would pay them via Venmo,  
17 and then later on the business would reimburse me in  
18 whatever payout I got.

19 Q. After you left the country in late 2015, did you have  
20 any further involvement in paying other members of the  
21 organization?

22 A. No.

23 Q. Who directed others on what to do?

24 A. Aaron did.

25 Q. Did you have a little bit of control in that before you

1 left the country?

2 A. Not really. I mean, I trained Luke how to use the  
3 press, you know, and Aaron was there but I kind of did the  
4 hands-on training of it. I talked to Katie and Alex when  
5 they were shipping things out to see if they were low on  
6 stamps or shipping supplies and if I needed to bring more.  
7 Aaron would ask me to bring them wages occasionally. He  
8 would just give me a stack of cash and I would drive over to  
9 their house.

10 Q. But he was directing you what to do?

11 A. Yes.

12 Q. Who made the final decision on how to address customer  
13 service complaints over \$500?

14 A. Aaron did.

15 Q. Who made the decision to start pressing and selling  
16 pills laced with Fentanyl?

17 A. Aaron did.

18 Q. Did you have any involvement in that whatsoever?

19 A. No.

20 Q. Were you in the United States when those pills were  
21 being pressed?

22 A. No.

23 Q. Did you ever run that Fentanyl pill press, pressing  
24 Fentanyl pills?

25 A. No. I have never seen that press before.

1 Q. Looking back, how do you feel about what you did?

2 A. I feel terrible. I am absolutely ashamed about what I  
3 did. It enabled people with an addiction to further that.  
4 I did some terrible things and I did it all for money. I do  
5 not feel good about it at all.

6 Q. Have you heard about the opioid epidemic?

7 A. Yes.

8 Q. How do you think you and Mr. Shamo affected that?

9 A. I think we made it very, very easy to get more and more  
10 pills for less money, and I think it exacerbates the problem  
11 when someone can get it for very cheap and in huge  
12 quantities.

13 Q. Looking back and thinking about it since your arrest  
14 and spending all of this time in custody, do you have any  
15 empathy for those affected by your and Mr. Shamo's actions?

16 A. Absolutely. I live with people that are struggling  
17 with their addictions every day, you know, and it is not  
18 pretty at all. Oftentimes they try so hard but they can't  
19 help themselves and they come in and out of jail. Watching  
20 someone come down from withdrawal is terrible. I have seen  
21 it many times now and it is bad. It is just ruining people  
22 and their families too. People come into jail and they have  
23 no money and no means of support and their families have to  
24 pick that all up. They are always stealing from their  
25 families to get more drugs for themselves, and their



1 families and their friends and their loved ones are paying  
2 the price as well.

3 Q. So you regret your involvement in this?

4 A. Absolutely.

5 Q. But you're owning up to it?

6 A. Yes.

7 Q. Thank you.

8 MR. STEJSKAL: No further questions at this time,  
9 Your Honor.

10 THE COURT: Thank you, Mr. Stejskal.

11 Mr. Skordas, you may cross-examine.

12 MR. SKORDAS: Thank you, Your Honor.

13 Could we look at Government's Exhibit 23.01,  
14 please.

15 CROSS-EXAMINATION

16 BY MR. SKORDAS

17 Q. Good morning, Mr. Crandall.

18 A. Good morning.

19 Q. Do you remember signing this agreement?

20 A. Yes, I do.

21 Q. Go to page 9 of that. That is in fact your signature,  
22 isn't it?

23 A. Yes, it is.

24 Q. And it is a signature dated October 17th of last year,  
25 correct?

1 A. Yes.

2 Q. Why don't you read for the jury paragraph 9 there.

3 A. I understand and agree to all of the above. I know  
4 that I am free to change or delete anything contained in  
5 this statement, and I do not wish to make changes to this  
6 agreement because I agree with the terms and all of the  
7 statements are correct.

8 Q. That is what you stated to a court in this very  
9 building on October 17, 2018, correct?

10 A. Yes.

11 Q. Go to page 1 of that agreement. It says under  
12 paragraph one that you're going to be pleading guilty to  
13 counts two, three and 13 of the indictment, correct?

14 A. Correct.

15 Q. Count two is specified down there on the very bottom --

16 MR. SKORDAS: If you could highlight that, please,  
17 Yvette. Thank you.

18 BY MR. SKORDAS

19 Q. Conspiracy to distribute Fentanyl, correct?

20 A. Yes.

21 Q. Read the last line, the fifth element of that.

22 A. The overall scope of the conspiracy involved at least  
23 400 grams of Fentanyl.

24 Q. And read the second line of that.

25 A. The defendant knew the essential objection of the

1 conspiracy.

2 Q. And the third line --

3 A. The defendant knowingly and voluntarily involved  
4 himself in the conspiracy.

5 Q. You knew what the conspiracy was and you knowingly and  
6 voluntarily involved yourself in the conspiracy, and the  
7 conspiracy was to distribute at least 400 grams of Fentanyl,  
8 correct?

9 A. Correct.

10 Q. You knew that is what you were doing?

11 A. Yes.

12 Q. And you voluntarily did it?

13 A. Yes.

14 Q. And you knew that is what was going on here, correct?

15 A. Yes.

16 Q. There was no doubt in your mind as to what was being  
17 distributed, was there?

18 A. No.

19 Q. You knew it wasn't Oxycontin that was being  
20 distributed, didn't you?

21 A. I learned that very quickly once I started doing  
22 customer service again, yes.

23 Q. That was not my question. You knew that you were  
24 distributing Fentanyl, correct?

25 A. Correct.

1 Q. You pled guilty to that because it was true, correct?

2 A. Yes.

3 Q. And if you look at count two of this -- excuse me.

4 The second count that you pled guilty to which was  
5 count three, on the second page the same -- thank you.

6 The exact same is true for the Alprazolam, correct?

7 A. Correct.

8 Q. The Xanax, if you will. You knew that you were  
9 distributing that as well, correct?

10 A. Yes.

11 Q. And you pled guilty to that?

12 A. Yeah.

13 Q. And you pled guilty to conspiracy to commit money  
14 laundering, correct?

15 A. Yes.

16 Q. Because you knew that you were laundering money?

17 A. Yes.

18 Q. There is a little box at the bottom of page 2. You  
19 also understand, don't you, that there are significant  
20 penalties that arise from each of those counts, correct?

21 A. Yes.

22 Q. And you could serve a significant period of time for  
23 that, right?

24 A. Yes.

25 Q. But importantly you avoided much more significant time

1 by not pleading guilty to the death related count, correct?

2 A. Yes.

3 Q. Your attorney told you that, correct?

4 A. Yes.

5 Q. You don't want to have to plead guilty to that one or  
6 be charged with that one, correct?

7 A. I was not around and part of the organization when that  
8 death occurred.

9 Q. So it is not your fault?

10 A. I am not saying it is not my fault.

11 Q. I think that is exactly what you just said. You're not  
12 responsible for that. Let them suck it up.

13 Isn't that what you're saying?

14 Let's go to page 11 of this agreement. This is an  
15 addendum to this plea, correct?

16 A. Yes.

17 Q. And there is a paragraph there on the bottom where it  
18 says you agree to testify truthfully and completely for the  
19 United States in any subsequent court hearing or trial  
20 related to this case if called upon, correct?

21 A. Correct.

22 Q. The only subsequent court hearing or trial related to  
23 this case is today, this very minute, correct?

24 A. Yes.

25 Q. You have not testified in any other capacity, have you?

1 A. No.

2 Q. It also says that you agree to await sentencing until  
3 everybody else in this case has been sentenced, correct?

4 A. Yes.

5 Q. So notwithstanding that this plea was entered in  
6 October of last year, you still have not been sentenced?

7 A. No, I have not.

8 Q. And part of the reason you have not been sentenced is  
9 because what is going to happen at your sentencing is  
10 largely contingent on what you do today, correct?

11 A. I hope that it is.

12 Q. And you hope that you'll be found to have testified  
13 truthfully and completely, correct?

14 A. Yes.

15 Q. But Aaron and I don't decide if you testified  
16 truthfully, do we?

17 A. No.

18 Q. This jury of 14 people don't get to tell the Judge  
19 whether you testified truthfully, do they?

20 A. No.

21 Q. Your lawyer and your parents and your family don't get  
22 to tell the Judge that you testified truthfully, do they?

23 A. No.

24 Q. These three men here get to tell the Judge that,  
25 correct?

1 A. I guess so.

2 Q. They are the deciders of if you tell the truth today,  
3 direct?

4 A. Correct.

5 Q. They told you that they will tell the Judge whether or  
6 not they feel like you have told the truth?

7 A. Yes.

8 Q. Correct?

9 A. Correct.

10 Q. In response to how well you do today in testifying  
11 against Aaron Shamo, correct?

12 A. That and in response to the evidence that they have  
13 gathered.

14 Q. You don't have to tell the truth about anything else,  
15 right? You have not been questioned about any other  
16 individuals that you have had to testify in court about,  
17 have you?

18 A. I have not testified in court against anyone else.

19 Q. And you are never going to, are you?

20 A. They have all pled guilty so, no, I don't have to.

21 Q. And none of them are in jail, are they?

22 A. No.

23 Q. You're the only person in jail besides Aaron, correct?

24 A. Correct.

25 Q. And you were arrested about four months after he was,

1 correct?

2 A. About seven or six.

3 Q. I am sorry. My math is bad.

4 You have been in jail continually since then?

5 A. Yes.

6 Q. As far as you know, looking at that chart, you and  
7 Aaron are the only people that have spent a minute in jail,  
8 correct?

9 A. Correct.

10 Q. You have given an interview to law enforcement in  
11 connection with this case, correct?

12 A. Yes.

13 Q. Have you had a chance to review that prior to  
14 testifying today?

15 A. No.

16 Q. Would it help you if you saw it in your testimony  
17 today?

18 A. No.

19 Q. You think you can remember everything that you said?

20 A. Yes.

21 Q. You were asked whether or not Aaron was very smart,  
22 correct?

23 A. Yes.

24 Q. And you told law enforcement no, correct?

25 A. Correct.



1 Q. You said, well, but he can Google things?

2 A. Yes.

3 Q. Did you tell law enforcement the truth when you gave  
4 that statement?

5 A. Yes.

6 Q. Mostly?

7 A. Mostly.

8 Q. Did you tell law enforcement the truth when they asked  
9 was Aaron very smart and you said no?

10 A. Yes.

11 Q. Did you tell law enforcement the truth about your  
12 involvement in this case?

13 A. Yes.

14 Q. Did you hold back a little bit?

15 A. No.

16 Q. Do you remember talking to law enforcement and  
17 describing Aaron -- or having law enforcement describe Aaron  
18 as a moron?

19 A. I don't recall that.

20 Q. Would it help you if you saw that?

21 A. Yes.

22 MR. SKORDAS: May I, Your Honor?

23 THE COURT: You may.

24 BY MR. SKORDAS

25 Q. Just take a look at that for me, Drew.

1           What is that?

2       A.    A transcript of my interview with law enforcement on  
3       the 13th of June in 2017.

4       Q.    Who was present, do you recall?

5       A.    Law enforcement agents, an I.R.S. agent, a postal  
6       inspector, my lawyer and some of the prosecutors.

7       Q.    You had a couple lawyers there, didn't you?

8       A.    Yes.

9       Q.    Turn to page 127 of that. It is on the top right-hand  
10      --

11      A.    127?

12      Q.    1-2-7, yes, sir.

13           At some point during the interview law enforcement  
14      didn't think you were being very honest, did they?

15      A.    Yes.

16      Q.    Why don't you read that question that begins on page 9.  
17      Excuse me. Line 9.

18      A.    And -- because last time I told you I appreciate your  
19      honesty, but, you know -- and when you're telling me that --  
20      I mean, we have a tendency to do this when we are in  
21      trouble. Okay. All I wanted to do was this -- was my plan.  
22      Your actions say something very different. Very different.  
23      You know what I mean? You're telling me you set the -- you  
24      set the entire press, and Shamo is such a moron that he  
25      can't do the mixes right or learn how to operate the

1 machine. You're doing all of it and you are getting  
2 basically nothing for it, you know, in comparison. That  
3 sounds really strange.

4 Q. That is the question that law enforcement asked you,  
5 correct?

6 A. Correct.

7 Q. You're saying that Aaron is such a moron that he can't  
8 even do anything?

9 A. Correct.

10 Q. That was paraphrasing your comments to them, correct?

11 A. Yes.

12 Q. Go to page 128. That is the next page, correct?

13 A. Yes.

14 Q. The officers asked you a question that begins on line  
15 11. Why don't you read the jury that question.

16 A. You're not the only person that we have talked to that  
17 has parroted this exact same thing. You're -- but it is  
18 so -- it is -- I mean, you're looking at a bunch of people  
19 here who had --

20 MR. STEJSKAL: Your Honor, I am going to object at  
21 this point. He is asking him to read the questions and not  
22 the answers. These are not previous statements of this  
23 witness.

24 THE COURT: This is --

25 MR. SKORDAS: I can have him read his answers.

1 That is fine.

2 THE COURT: You need to have him read the answers.

3 BY MR. SKORDAS

4 Q. All right. Let's back up one page. We earlier had you  
5 read a question that began on line 9. Read your answer on  
6 line 21.

7 A. I don't know why I protected him so much and why I feel  
8 like I'm so loyal to him. I -- I don't know. I mean, when  
9 I look at it in retrospect, I feel like I have been abused  
10 and I keep going back to him. You know, I don't know. I  
11 guess I'm just looking for acceptance from someone, a  
12 friend. I really don't know. I mean there is no other  
13 money that I received and I don't know why I have such  
14 loyalty to the guy. I don't know. I really don't know why  
15 I protected him so much.

16 Q. Now read the next question and your answer.

17 A. You're not the only person that we have talked to who  
18 has parroted this exact same thing. But it is so -- it  
19 is -- I mean, you're looking at a bunch of people here who  
20 if we had been in the situation -- like it sounds like you  
21 were doing everything. You're setting up the machines,  
22 pressing, you're making sure he got -- you were so worried  
23 about him doing the mixes right that you created a computer  
24 program, you know. You knew he was running oxys, you know,  
25 eventually, and you knew oxys were going through the system

1 and stuff like that. You know, you talk to a guy like  
2 Vance, you know, and this guy -- all these people who are  
3 receiving packages, and they are making just a little bit of  
4 money and then Aaron is sitting on almost a half a million  
5 dollars in cash. How is that -- I don't understand. How is  
6 he a master manipulator? What is the deal?

7 Q. Your answer?

8 A. He is really good at manipulating for sure.

9 Q. Is that the way you remember this conversation going?

10 A. Yes.

11 Q. Well, since we are there, why don't we continue. Just  
12 finish that page.

13 A. Why do you say that? I mean, tell me some examples of  
14 that other than this enormous one here. I mean, whenever we  
15 would go out to someplace, some bar, some dinner place he  
16 would always get his way. He is always kind of, you know,  
17 gaining an ally, use that ally to, you know, get everyone  
18 else to agree to it. He was always the ringleader in the  
19 friends group. Everyone looked up to him. He was the one  
20 that everyone called first to hang out. He was kind of the  
21 leader in the group, you know, and he is always -- it is  
22 kind of his personality. He has always been the leader on  
23 the top. You know, he will cheat his way to get to the top.

24 Q. That is how you described Aaron that day, correct?

25 A. Yes.

1 Q. That was in response to it looks like about an hour of  
2 interview and interrogation by law enforcement, correct?

3 A. Yes.

4 Q. You were arrested in Hawaii; is that right?

5 A. Yes.

6 Q. What was the date of that?

7 A. May 5th, 2017.

8 Q. You were there for a wedding with Sasha?

9 A. Yes.

10 Q. And you never did get married, did you?

11 A. No.

12 Q. And all the people that flew out there didn't get to  
13 participate in that, correct?

14 A. Correct.

15 Q. You were taken into custody?

16 A. Yes.

17 Q. And you have remained in custody ever since?

18 A. Yes.

19 Q. And you argued both in Hawaii and in Utah to be  
20 released, correct?

21 A. Yes.

22 Q. I think the prosecutor asked you if the judge was the  
23 one that made the decision to hold you; is that right?

24 A. Yes.

25 Q. And the judge did make that decision, correct?

1 A. Yes.

2 Q. What did the government argue?

3 A. That I was a flight risk and a danger to the community.

4 Q. And that you should be held?

5 A. And that I should be held.

6 Q. And the judge agreed with that, correct?

7 A. Yes.

8 Q. Over your objection and your attorney's pleading,  
9 correct?

10 A. Yes.

11 Q. Both here and in Hawaii?

12 A. Yes.

13 Q. The government asked that you be held?

14 A. Yes.

15 Q. And the judge followed that recommendation?

16 A. Yes.

17 Q. And you have been held ever since?

18 A. Yes, I have.

19 Q. At any time did you have your own Bitcoin account?

20 A. Yes.

21 Q. Did you at all times have your own Bitcoin account?

22 A. I always had the ability to create a new wallet in the  
23 various services that I used.

24 Q. How do you create a wallet in Bitcoin?

25 A. You just press a button and it will generate a new

1 wallet address for you. I don't know exactly how the system  
2 generates a new one, but I know that you can generate as  
3 many as you need.

4 Q. And you lived off of Bitcoins and wages and things like  
5 that while you were traveling around the world, correct?

6 A. Yes.

7 Q. As I understood it and listening, you traveled to New  
8 Zealand?

9 A. Yes.

10 Q. Thailand?

11 A. Yes.

12 Q. Laos?

13 A. Yep.

14 Q. Indonesia?

15 A. Yes.

16 Q. Australia?

17 A. Yes.

18 Q. Hawaii?

19 A. Yes.

20 Q. What did I miss?

21 A. Cambodia, Malaysia and Singapore.

22 Q. In which of those jurisdictions did you work?

23 A. In Australia and New Zealand.

24 Q. What did you do in Australia?

25 A. I was customer support and tech support for an



1 e-commerce company. They helped you as a small business  
2 create a website to sell from, like a Shopify type version  
3 for Australia.

4 Q. How long did you have that job?

5 A. Five months.

6 Q. What did you do in New Zealand? I think you already  
7 described that.

8 A. I worked at a fish and chips restaurant doing prep work  
9 for them. I worked on a farm picking weeds a few times. I  
10 picked fruit. We were house-sitting to avoid that. And  
11 then I worked for Aaron's organization doing customer  
12 service.

13 Q. I think you described your work in New Zealand as  
14 minimum wage?

15 A. Yes.

16 Q. Is that correct?

17 But minimum wage does not allow you to travel to  
18 Thailand, Laos, Indonesia, Singapore and Hawaii and  
19 Australia, does it?

20 A. No.

21 Q. Getting money from your folks or your friends in Utah  
22 allows you to live that lifestyle, correct?

23 A. Getting money from the drug trafficking I did before I  
24 left allowed me to do that.

25 Q. And getting money from drug trafficking while you're

1 not even involved in the enterprise anymore, correct,  
2 according to you?

3 A. Yes.

4 Q. You're getting money for something and everyone else is  
5 doing all of the work? Isn't that fair? Isn't that a fair  
6 recitation of what you said?

7 A. It is money that Aaron and I agreed on originally.

8 Q. But you're not doing anything you claim and you're  
9 still getting money?

10 A. I'm getting back pay, yes.

11 Q. Everybody on that chart is here in Utah taking all the  
12 risk and you're on the other side of the world getting paid,  
13 correct?

14 A. I took the risk for over a year when I was in the  
15 country. But, yes, once I left I am not taking any of the  
16 risk, but I am still receiving payments from Aaron.

17 Q. Because at that point you had earned something from  
18 this organization, correct?

19 A. Aaron and I made an agreement.

20 Q. You had earned the right to travel the world and  
21 continue to get paid for doing nothing, correct?

22 A. No. I chose that. I didn't earn that. I chose to  
23 leave the country to get away from -- to get away from  
24 everything. I wanted to separate myself from it. I didn't  
25 feel right about it from the beginning. I had some moral

1 reservations about it and I wanted to leave the country to  
2 get away from that and make that clean break.

3 Q. Can we go to Exhibit 15.05, page 5?

4 If you look at the top of this, and we have already  
5 talked about this a little bit, it is an e-mail from you to  
6 the two girls, Alex and Katie, correct?

7 A. Correct.

8 Q. November 20th of 2016, correct?

9 A. Yes.

10 Q. After you had made a clean break from the organization,  
11 correct?

12 A. Correct.

13 Q. And two days before Aaron was arrested, correct?

14 A. Yes.

15 Q. And things were starting to happen at this time,  
16 weren't they?

17 A. What things?

18 Q. Well, you have learned since that Ryan Jensen had been  
19 arrested, correct?

20 A. Not at this point, no.

21 Q. And that Sean Gygi was already working with the  
22 government, correct?

23 A. No. After the fact, but not at this date.

24 Q. I understand. Okay. You now know that?

25 A. I now know that, yes.

1 Q. You now know why everything was going haywire during  
2 this time, correct?

3 A. Yes.

4 Q. And you learned two days later that Aaron had been  
5 arrested, correct?

6 A. Yes.

7 Q. And you took some fairly significant steps to shield  
8 yourself from Aaron and this entire organization, correct?

9 A. Yes.

10 Q. You went to a bank and sold your Bitcoin wallet,  
11 correct? You went somewhere and sold it.

12 A. I went to -- I went online and sold my Bitcoins that  
13 were in my wallet and transferred them to my bank.

14 Q. Let's turn to Exhibit 16.08. This is a picture of some  
15 fellow cashing you out of your Bitcoins, correct?

16 A. Correct.

17 Q. On November 22nd?

18 A. Yes.

19 Q. The day you learned, right --

20 A. Yes.

21 Q. You also reached out to several people involved in this  
22 organization, correct?

23 A. People that I know had been involved before I left, but  
24 I was not sure if they were still involved, but, yes.

25 Q. You wanted to know what was going on, right?

1 A. Yes.

2 Q. You reached out to Sean Gygi?

3 A. Yes.

4 Q. I think you said you reached out to -- Sean Gygi lied  
5 to you and told you everything is fine, correct?

6 A. Correct.

7 Q. You reached out to Dan Allen?

8 A. Yes.

9 Q. And he told you everything was nuts, correct?

10 A. Yes.

11 Q. You reached out to Mario Noble?

12 A. Sasha did.

13 Q. I'm sorry. Sahsa did.

14 He sort of lied to you guys, too, at that point,  
15 correct?

16 A. Yes.

17 Q. He was kind of vague about what was going on I think is  
18 the way you described him, correct?

19 A. Yes.

20 Q. You then went -- and maybe I don't have my things in  
21 order -- and started getting rid of your fingerprint on the  
22 internet, correct?

23 A. Yes.

24 Q. You started shutting down accounts, correct?

25 A. Yes.

1 Q. You went immediately and did that, right?

2 A. Yes.

3 Q. Right?

4 You told law enforcement you did that to cover  
5 yourself, correct?

6 A. Yes.

7 Q. In fact, you and your fiancée sort of laid low for what  
8 you thought was a safe period of time, two months, right?

9 A. Yes.

10 Q. You were done with this at that point, right? You had  
11 washed your hands of Aaron and everybody else?

12 A. Yes.

13 Q. And you had done everything that you could to get as  
14 far away from that as possible?

15 A. Yes.

16 Q. And after two months of not hearing anything you  
17 decided it was probably safe to come back to the United  
18 States?

19 A. No. I decided to go through with my wedding. I guess,  
20 yes, the wedding was going to be in Hawaii. Yes, I didn't  
21 think I was going to be arrested when I landed in Hawaii.

22 Q. Otherwise you probably wouldn't have landed in Hawaii,  
23 correct?

24 A. I would have tried to contact someone here if I knew I  
25 was going to be arrested, and I probably would have

1     contacted law enforcement and contacted a lawyer to make  
2     sure that they were there when I landed.

3     Q.    Prior to the day you were arrested in Hawaii, you had  
4     not done any of that?

5     A.    Correct.

6     Q.    You had not reached out to law enforcement?

7     A.    Correct.

8     Q.    You had not done anything at all to help absolve  
9     yourself or take any responsibility or own anything in  
10    relation to this, correct?

11    A.    Correct.

12    Q.    You had done just the opposite.  You had erased  
13    everything that you could find that had your fingerprints on  
14    it, correct?

15    A.    Yes.

16    Q.    You talked about something called a pill press.

17    A.    Yes.

18    Q.    Tell the jury what a pill press is.

19    A.    A pill press is a machine that takes powders and  
20    presses it into a pill based on the mold you have.

21    Q.    And part of the reason that you use a pill press is so  
22    that you can make the powder look like a pill, right?

23    A.    Yes.

24    Q.    Because people don't want powder and they don't want it  
25    in a gelcap.  They want the real deal, right?

1 A. Correct.

2 Q. And so you got a press to make the powder look like it  
3 is the real deal, right?

4 A. I didn't get the press, but, yes, Aaron and I got --

5 Q. I know it is everybody else's fault. I'm just asking.

6 A. Yes.

7 Q. And you put some inert substance in there, some filler,  
8 right?

9 A. Yes.

10 Q. What did you use for that?

11 A. It is microcrystalline cellulose.

12 Q. What is that? Do you know?

13 A. I don't. It is just I think what every pill has as a  
14 filler to get the shape and the weight that you want.

15 Q. And how did you get the shape that you wanted?

16 A. Molds were purchased online.

17 Q. The mold of a pill?

18 A. Yes.

19 Q. And how did you get the weight that you wanted?

20 A. By getting a real version of the pill and weighing it  
21 or just comparing the size.

22 Q. And how did you get the ratio of the quantity that made  
23 the pill the appropriate strength?

24 A. Aaron gave that to me.

25 Q. But you figured it out, right? You're the one that did



1 the math calculation on it, correct?

2 A. Yes, because Aaron would always ask me to do it for  
3 him. He would say, hey, I am having troubling figuring out  
4 this math, this ratio. Will you do this for me?

5 Q. And you did?

6 A. Yes.

7 Q. You figured out that if you put two drops of this in  
8 and ten drops of this in you'll have a 20-percent solution?

9 A. Yes.

10 Q. Because Aaron couldn't figure that out?

11 A. No, he didn't want to do it. He could figure it out  
12 himself.

13 Q. But he never did, did he?

14 A. He did sometimes. I was not always there when he was  
15 pressing.

16 Q. That is because you had already set up the formula,  
17 correct?

18 A. It is because I solved the algebra problem, but  
19 sometime before we even had that he would text me through  
20 Telegram and ask --

21 Q. How did you get the consistency --

22 THE COURT: Let him finish his answer.

23 MR. SKORDAS: I am sorry.

24 THE WITNESS: Sometimes he would text me through  
25 Telegram and tell me what the pills were weighing and then I

1 would quickly do the math problem for him and respond.

2 BY MR. SKORDAS

3 Q. How did you get the consistency? How did you get the  
4 powder to hold together?

5 A. The pill press does that for you with the pressure. I  
6 think there is binders that are included in the inert  
7 substance that help bind the pill together.

8 Q. In the microcrystalline or whatever it is called?

9 A. Yeah.

10 Q. How did you get the color of the pill to match?

11 A. Trial and error and looking at it. The Xanax we  
12 pressed we added no color. When we tried to press M.D.M.A.,  
13 we just decided on blue and kept adding a blue filler until  
14 it looked right.

15 Q. The Xanax was already white?

16 A. Yes.

17 Q. And you used Alprazolam to make that --

18 A. Yes.

19 Q. -- that you were buying from China?

20 A. Yes.

21 Q. You remember this interview with your lawyers and law  
22 enforcement that you have already described and that you  
23 have in front of you there, correct?

24 A. Yes.

25 Q. They were pretty upset with Aaron Shamo at the time,

1 weren't they?

2 A. I assume so. I don't know their state of mind.

3 Q. You were, too, by the end of that, weren't you?

4 A. Yeah.

5 Q. They had done a pretty good job of getting you upset  
6 about this whole deal, hadn't they?

7 A. I think I was upset before that, but, yes, they helped  
8 play into that, I guess.

9 Q. Not so upset that you didn't want to get out of this  
10 easy money, correct?

11 A. Sorry? One more time.

12 Q. You were not so upset with what was going on that you  
13 got out of it?

14 A. I did make a break at one point, but I did return to  
15 it, so yes.

16 Q. Because it was easy money?

17 A. Yes.

18 Q. It was a lot easier than cleaning houses in New  
19 Zealand?

20 A. Yes.

21 Q. Or waiting tables?

22 A. Yes.

23 MR. SKORDAS: That's all that I have, Your Honor.

24 THE COURT: Thank you.

25 Let's take our longer break and then you can

1 redirect, unless it is just a second or two.

2 MR. STEJSKAL: I am not sure yet, so --

3 THE COURT: All right. We'll be in recess until  
4 about 20 to.

5 (WHEREUPON, the jury leaves the proceedings.)

6 THE COURT: We'll see you in about 30 minutes.

7 (Recess)

8 THE COURT: I understand that the government is  
9 not going to do redirect on Mr. Crandall?

10 MR. GADD: Yes, sir. That is correct.

11 THE COURT: No redirect and no recross and we have  
12 excused him.

13 MR. GADD: Yes, sir.

14 THE COURT: All right.

15 Do you have another witness ready to go?

16 MR. GADD: We do.

17 THE COURT: Mr. Skordas, is he here?

18 MR. GADD: He is here.

19 THE COURT: There he is.

20 Everybody is ready. Let's get the jury.

21 MR. GADD: Your Honor, would you mind just telling  
22 them once they come in that we had no further questions for  
23 Mr. Crandall just so that it makes sense in their minds what  
24 is happening?

25 THE COURT: Yes.

1 MR. GADD: Thank you.

2 (WHEREUPON, the jury enters the proceedings.)

3 THE COURT: The government is not doing a redirect  
4 on Mr. Crandall, so no redirect and no recross and so he has  
5 been excused so we're on to the next witness.

6 The government may call its next witness.

7 MR. GADD: Your Honor, the United States calls  
8 Mario Noble.

9 THE COURT: Come forward and be sworn, please,  
10 right up here in front of the clerk of court as soon as she  
11 gets here.

12 MARIO NOBLE

13 Having been duly sworn, was examined

14 and testified as follows:

15 THE WITNESS: My name is Mario Noble, M-a-r-i-o,  
16 N-o-b-l-e.

17 THE COURT: You may proceed, Mr. Gadd.

18 MR. GADD: Thank you, sir.

19 DIRECT EXAMINATION

20 BY MR. GADD

21 Q. Mr. Noble, are you prepared to testify about your part  
22 in the Pharma-Master organization?

23 A. Yes.

24 Q. Before we do that, could you tell us just a little bit  
25 about yourself?

1 A. Yeah. I was born and raised in southern California. I  
2 spent 23 years there. I moved up here to Utah about eight  
3 years ago. I am currently working as a personal trainer,  
4 hoping to get into a web development field. I like to stay  
5 active in the gym and spend time with my dogs.

6 Q. Let's talk for a minute about relationships.

7 MR. GADD: If we could pull up Exhibit 1706?

8 BY MR. GADD

9 Q. You'll see it on your screen, but there is also a chart  
10 next to you. I want to ask you some questions once that  
11 pops up on the screen.

12 THE COURT: Can you hear Mr. Gadd all right?

13 Okay.

14 MR. GADD: I will get even closer.

15 BY MR. GADD

16 Q. Can you see that on your screen okay?

17 A. Yes, I can.

18 Q. All right. Do you know Mr. Shamo?

19 A. I do.

20 Q. Who else do you know?

21 A. Paz, Crandall, Tonge, Bustin, Gygi, Bruner and Bernal.  
22 That is it.

23 Q. How did you first meet Mr. Shamo?

24 A. I met him through Drew Crandall's girlfriend.

25 Q. We have heard her name a bit today. Go ahead and tell

1 us. What was her name?

2 A. Sasha Grant.

3 Q. Did you two become friends?

4 A. Almost.

5 Q. That word means something to you, doesn't it, friend?

6 A. Yes.

7 Q. Why don't you tell the jury, what is a friend to you?

8 A. A friend to me would be somebody that you kind of spend  
9 time with without any other obligation, somebody that you  
10 choose to spend time with.

11 Q. When you say you were almost friends with Mr. Shamo,  
12 what do you mean?

13 A. We chose to spend time together, but most of the time  
14 we spent together was business related.

15 Q. In 2016 did you spend some time together socially?

16 A. Yes.

17 Q. And then certainly time together in business pursuits?

18 A. Yes.

19 Q. Do you have an opinion as to whether or not Mr. Shamo  
20 was a, to borrow a phrase, high roller?

21 A. From where I was and my perspective and the stories  
22 that he told me made it seem like he was, yeah.

23 Q. How so?

24 A. All of his vacations he was staying in like really nice  
25 hotels and really nice rooms. Every time I went out with

1 him he had his own table that multiple people were on and he  
2 was the only person paying for them and different things  
3 like that.

4 Q. When you say table, is that like at a club?

5 A. Yes. Like a V.I.P. table at a club that you had to  
6 specifically pay for and only the people that you allowed  
7 could come on the table.

8 Q. You have some knowledge of his vacations, right?

9 A. He told me stories when like he would come back and  
10 stuff, yeah.

11 Q. And part of the reason he talked to you about vacations  
12 was because you were kind of covering for him while he was  
13 gone, right?

14 A. That is true. Yes.

15 Q. What sort of vacations do you recall him going on?

16 A. I remember him going to Mexico and I remember him going  
17 down to Vegas a couple of times.

18 Q. Trips to Tahoe?

19 A. Yeah. There were stories there too.

20 Q. We have heard some people talk about Park City Live.  
21 Did you ever go there?

22 A. Not with Shamo.

23 Q. You have been there, though?

24 A. After, yes.

25 Q. What is that?



1 A. It is like a music venue.

2 Q. How frequently did he make trips to Vegas?

3 A. I can remember two trips to Vegas.

4 Q. You mentioned that you had a business type of  
5 relationship with him. Let's talk about how you were  
6 recruited. How were you first kind of introduced to it?  
7 How did you get involved?

8 A. Well, I was actually going -- meeting with him to buy  
9 drugs for my personal recreation, and he informed me that he  
10 had a potential job opportunity for me if I was interested.

11 Q. Do you know approximately when that took place?

12 A. I believe it was toward the end of January of 2016,  
13 beginning of February of 2016.

14 Q. What was it that he wanted you to do?

15 A. Initially he wanted me to open my own store on the dark  
16 web and sell my own product that he would supply me with.

17 Q. What happened to your store?

18 A. It never got off the ground. There was never -- like  
19 the supply could never come through.

20 Q. That was his responsibility, though, right?

21 A. Correct.

22 Q. And then at some point you took on a slightly different  
23 role, correct?

24 A. I did, yes.

25 Q. Can you walk us through that?

1 A. He asked me while he was going on vacation to respond  
2 to customer service requests.

3 Q. And that turned into a more permanent position?

4 A. It did.

5 Q. For doing customer service, how much did Mr. Shamo  
6 agree to pay you?

7 A. I don't remember the initial amount, but it was kind of  
8 like on an hourly rate.

9 Q. And you negotiated that with him over time, right?

10 A. I did.

11 Q. Was he prompt at paying your wages?

12 A. Not always.

13 Q. How many hours on average would you work for him in a  
14 given week?

15 A. Usually it was about six to seven.

16 Q. Let's talk first about customer service. Who taught  
17 you how to perform your customer service duties?

18 A. I have been in the customer service industry for about  
19 seven or eight years so I have picked up a lot of my own --  
20 how to respond to customers and what they like and things  
21 like that. I was also working at eBay at the time, which my  
22 job was to tell people how to respond to their customers, so  
23 I had a pretty good idea how to do it myself.

24 Q. Had you had any experience with the dark net?

25 A. No. Zero.

1 Q. Had you ever performed customer service for a dark net  
2 vendor?

3 A. No.

4 Q. Was there a little bit of a learning curve for you?

5 A. A little bit.

6 Q. Who taught you that aspect of it then?

7 A. Some of it I picked up like going through the process  
8 and then I would like bounce things off of Shamo.

9 Q. Do you know or do you recall the name of Mr. Shamo's  
10 seller account?

11 A. Pharma-Master.

12 Q. In order to do customer service for Mr. Shamo as  
13 Pharma-Master, did you have to log in to AlphaBay?

14 A. I did, yes.

15 Q. Did you use your old log-in?

16 A. I used my own account, yeah.

17 Q. That was the account that you set up in order to have  
18 your own store, right?

19 A. Correct.

20 Q. What was the name on your account?

21 A. My store name was Dr. Wario.

22 Q. So if you logged in as Dr. Wario, how did you get  
23 access to Mr. Shamo's seller account, Pharma-Master?

24 A. AlphaBay had the ability to provide -- for your account  
25 to provide another account, kind of like backdoor access

1 without them actually having access to your direct account.

2 Q. Did they call it like shared access?

3 A. Uh-huh. Yes.

4 Q. Is that how you got into his account then, shared  
5 access?

6 A. Yes.

7 Q. Did you have full access to his account?

8 A. No, I did not.

9 Q. What sort of things could you see and access?

10 A. I could see the feedback, I could see the listings, I  
11 could see the orders and I could see the messages.

12 Q. How about the money, the drug proceeds, the payment,  
13 could you access that?

14 A. I could not.

15 Q. Could you make new listings, things for sale?

16 A. I don't remember.

17 Q. Let's look for just a minute at Exhibit 15.26. This is  
18 a video that you made with some agents. You will see it pop  
19 up on your screen and then I am hoping we can look at a  
20 point in that video. It is time stamped as 20:51.

21 Then if we could jump ahead to 20:51 there.

22 While we're going through it, let me just ask you a  
23 little bit of background about the video. You sat down with  
24 some agents I believe in December of 2016, right?

25 A. That is correct.

1 Q. They had the ability to take a video capture of the  
2 screen that you were working on with them, right?

3 A. Yes.

4 Q. You walked through AlphaBay, Pharma-Master, the e-mail  
5 account? That is what this video is, right?

6 A. Correct.

7 Q. All right. We're up here now at time stamp 20:51. You  
8 had mentioned that you had kind of backdoor access. Let's  
9 walk through this together and I want to ask you some  
10 questions. At the top right it says logged in as and it is  
11 going to zoom up there for you.

12 Can you still read that?

13 A. Yes.

14 Q. Who are you logged in as?

15 A. Dr. Wario.

16 Q. That is your account, right?

17 A. Correct.

18 MR. GADD: If we can zoom back out, Ms. Lauder.

19 BY MR. GADD

20 Q. Here you're looking at shared access. Can you kind of  
21 walk us through -- give control, take control, and what is  
22 going on there?

23 A. Yeah. Like I said, you had the ability to give another  
24 account control. So if I wanted to give somebody access to  
25 my account, I could go into give control and follow the

1 prompts there to provide another account access. Then under  
2 the take control tab is where somebody had provided me  
3 access to their account.

4 Q. It looks like as you work across to the right it says  
5 take control again and there are two words under that, sales  
6 and messages. Would you click on one of those in order to  
7 take control of Pharma-Master?

8 A. Yeah. So when you clicked on one of those, it would  
9 just take you to those pages as Pharma-Master.

10 Q. Once you were in there if you were to provide customer  
11 service feedback, would it look like it came from Dr. Wario?

12 A. No, it would not.

13 Q. Would it look like it came from Pharma-Master?

14 A. Yes.

15 Q. Those were the two items that you had shared access  
16 for, right?

17 A. Yes.

18 Q. Sales and messages?

19 A. Correct.

20 MR. GADD: Could we jump ahead to the time stamp  
21 34:42?

22 BY MR. GADD

23 Q. Okay. Take a minute to look at that there and then I  
24 want to ask you some questions about it.

25 We're here on a conversations tab, right?

1 A. Correct.

2 Q. And you have identified a conversation for these agents  
3 that are making the video capture, correct?

4 A. Yes.

5 Q. This is a message, correct?

6 A. Yes.

7 Q. Can you tell who it was sent by?

8 A. I cannot.

9 Q. If you were to look -- do you see where it says banned  
10 kind of right in the center?

11 A. Yes.

12 Q. Just to the left of that --

13 A. The account it was sent by was Pharma-Master, yes.

14 Q. That was probably a bad question the first time.

15 Sent by Pharma-Master?

16 A. Correct.

17 Q. And then can you read the message underneath?

18 A. It says this account owner got busted today. Please  
19 delete the account and disable it. Thanks, P.M.

20 Q. Over here to the left you can see it says Pharma-Master  
21 and banned, right?

22 A. Yes.

23 Q. Can you tell from this when that message was sent?

24 A. It says at the top November 23rd, 2016 at 17:17.

25 Q. The time stamp is dependent on wherever AlphaBay set up

1 their time zone, right?

2 A. Correct.

3 Q. You don't happen to know where they set it up, do you?

4 A. I do not.

5 Q. Did you send that message?

6 A. I did not.

7 Q. Do you know who sent it?

8 A. I do not.

9 Q. Were you ever able to deduce who sent it?

10 A. I can make assumptions.

11 Q. Walk us through them. What are your assumptions here?

12 A. Shamo was busted. I was at work and there was one  
13 other person who had access to the account.

14 Q. At the time did you know that other person who had some  
15 sort of access to it?

16 A. I knew there was somebody, but I didn't know who it  
17 was.

18 Q. They were also doing customer service like you, right?

19 A. At that time, yeah.

20 Q. Let's look at one more. Same Exhibit, 15.26. This  
21 will be two screen shots and the time stamp starts at 23:43.  
22 We're in the about tab here, right?

23 A. Yes.

24 Q. This is about team Pharma-Master?

25 A. Correct.



1 Q. I know it is a little hazy because it is a screen shot  
2 of a video, but are you able to read about us and shipping?  
3 You can see those?

4 A. Yes.

5 Q. Can you read that about us section to the jury?

6 A. Sure. We are a U.S. based team that prides ourselves  
7 in delivering the highest quality products. We pride  
8 ourselves in fast delivery, top-notch stealth and customer  
9 satisfaction. The product is always on point.

10 Q. Then shipping.

11 A. We guarantee we have the best stealth for the product  
12 that you purchase. Each order is sent within 24 to 48  
13 hours. We don't ship Saturday or Sunday so keep that in  
14 mind when placing your order.

15 Q. Can you read the next line down that starts with the  
16 two asterisks?

17 A. The please do not discuss?

18 Q. Yes.

19 A. Please do not discuss stealth specifics as I rotate  
20 stealth methods often.

21 Q. We're looking in the more about me or the about tab.  
22 Did you write any of this?

23 A. None of it.

24 Q. Do you know who wrote it?

25 A. I would assume Shamo, but we never talked about it.

1 Q. Was this here in some form or another once you started  
2 working for Mr. Shamo?

3 A. Yes.

4 Q. You can see just below where you finished reading there  
5 is an address section.

6 A. Uh-huh.

7 Q. Can up read that for the jury?

8 A. Please provide an address with my P.G.P. key. I'm  
9 getting a lot of weird addresses so please use this format.

10 Do you want me to read the format?

11 Q. No. That is okay.

12 MR. GADD: Can we look at 23:52?

13 BY MR. GADD

14 Q. You can see where that address format is kind of at the  
15 top of the screen, right?

16 A. Yes.

17 MR. GADD: Then if we could pick it up at the end  
18 of the address format where it says any order --

19 BY MR. GADD

20 Q. Could you read that?

21 A. Any order that does not have as address or is unable to  
22 be decrypted I cancel automatically. Just reorder if this  
23 happens and make sure to provide your address correctly.  
24 Any order without a first and last name I do not cover any  
25 shipping issues, no reship, no refund.

1 Q. Let's read the refund section. Could you read that  
2 one?

3 A. I always stand by my shipping and stealth. I will  
4 re-ship any product. That does not make it free of charge.  
5 Please wait to bring up non-delivered issues ten days after  
6 being marked shipped. Please reach out to me before leaving  
7 any type of feedback.

8 Q. Let's change gears now and let's talk about customer  
9 service and what a typical response might be. Could you  
10 explain to the jury kind of the process that you would go  
11 through to get a customer service inquiry and then give a  
12 typical response?

13 A. So I would go through the shared access, go into the  
14 messages, and typically I would scroll to the message that  
15 was received first because they were listed in order so I  
16 would go backwards. So the ones that were sent later got  
17 responded to first.

18 I would read their message and see what it was that  
19 they needed. A lot of the messages that they sent would  
20 follow along like a similar pattern, so I had a few canned  
21 responses ready.

22 Q. Did you encounter when you were doing customer service  
23 people who wanted to dispute with you?

24 A. Yes.

25 Q. Did you ever have instances where you needed to re-ship

1 or you needed to have product re-shipped to a customer?

2 A. I did, yes.

3 MR. GADD: Could we look quickly at 15.06 and  
4 let's go down to page 30. Then if we could look at the top  
5 half or so. All right.

6 BY MR. GADD

7 Q. Let's lay a little foundation here.

8 We're looking at an e-mail that is from DRW-99.

9 Who is that?

10 A. That is my e-mail account.

11 Q. It is at sigaint.org. What is that?

12 A. Like a dark web e-mail domain.

13 Q. Whose idea was it for you to set up an e-mail account  
14 on that?

15 A. Shamo's.

16 Q. Pass the peas. Who is that?

17 A. Those were the people that were responsible for  
18 shipping the product.

19 Q. American Steam?

20 A. That was Shamo.

21 Q. When you were sending e-mails you had a habit of  
22 replying to previous e-mails, right?

23 A. Correct.

24 Q. Is that why we see kind of this mess up here in the  
25 subject line?

1 A. Yeah.

2 Q. Reply, forward, reply?

3 A. Yes.

4 Q. And then in the body of this e-mail from you, you have  
5 got three asterisks and then you say disputers. That is it,  
6 right?

7 A. Yeah.

8 Q. You have attached something to this though, right?

9 A. Yeah.

10 Q. And that is what you're sending, right?

11 A. Yes.

12 Q. What is it that you would have attached? Do you want  
13 us to zoom out? Will that help?

14 A. I mean, if it was a dispute and I had something  
15 attached, it would be reshipments.

16 Q. When you attach a document, what type of file is it  
17 typically?

18 A. I would attach them as text documents.

19 Q. Would you encrypt them?

20 A. I would.

21 Q. Using P.G.P. encryption?

22 A. Yes.

23 Q. Let's talk about P.G.P. encryption and decrypting for  
24 just a moment. Did Mr. Shamo give you his private P.G.P.  
25 key?

1 A. He did.

2 Q. Did he send it to you by e-mail?

3 A. I don't remember.

4 Q. Let's look at 15.06, same exhibit, first page. Maybe  
5 this is helpful for the jury. There is this black box on  
6 top. Is that how it looked when you logged in?

7 A. Yes.

8 MR. GADD: And then if we can go back out, Ms.  
9 Lauder.

10 BY MR. GADD

11 Q. The rest of the stuff on the page, the white stuff,  
12 that is just the contents of the e-mails that would have  
13 been clicked on in that box, right?

14 A. Yeah.

15 Q. Okay. So you are looking at this first e-mail and this  
16 is another reply because that is your habit, right?

17 A. Yes.

18 Q. In the e-mail you say track, track, track, track, but  
19 I'm interested in the e-mail that you replied to. Do you  
20 see that there starting with the arrows?

21 A. Yeah.

22 Q. That is from Mr. Shamo, right?

23 A. Yes.

24 Q. In it he writes my P.G.P. key, yeah. So the question  
25 from before is did Mr. Shamo give you his private P.G.P.

1 key?

2 A. Yes.

3 Q. He also has some other information in that e-mail to  
4 you starting with market. Do you recognize what is below  
5 that?

6 A. That looks like the U.R.L. for the AlphaBay  
7 marketplace.

8 Q. And then there is pass with a colon. What is below  
9 that? Do you recognize that?

10 A. I do know that that is a password into something and  
11 then the words below that are like the code words. If you  
12 forgot your password, you had to have those code words to  
13 get a new password.

14 Q. Like a recovery phrase?

15 A. Right.

16 Q. You mentioned just a minute ago canned responses. I  
17 want to show the jury just a couple of them.

18 MR. GADD: If we could look at 17.08.

19 BY MR. GADD

20 Q. Do you recognize this?

21 A. I do.

22 Q. Did you create this list of canned responses?

23 A. I did.

24 Q. Would you kind of create it in order as you ran into  
25 something?

1 A. Yeah. As I got more and more messages around the same  
2 thread, I would create a canned response around it.

3 Q. You seem to sign your e-mails thanks, P.M.

4 Do you see that on there?

5 A. P dash M. Yeah.

6 Q. Thank you for clarifying that. P-M.

7 Was that always kind of how you signed off?

8 A. Always.

9 Q. If you would, read starting with tracking update and  
10 four or five rows down. Can you read us that canned  
11 response?

12 A. Yeah. Thank you for reaching out to us. We have  
13 investigated your order. You can find a link to the  
14 tracking for your order below. Tracking, and then that is  
15 where I put the tracking number, hope this helps. Let us  
16 know if you need any further assistance from us. Thanks,  
17 P-M.

18 Q. Having canned responses, did it make your job easier?

19 A. It did.

20 Q. Faster?

21 A. Yes.

22 Q. At some point were you being paid a flat rate?

23 A. I was.

24 Q. So efficiency was important to you?

25 A. Yes.



1 Q. Let's look at just one more. Go down four pages. The  
2 top one is custom under 5-K plus.

3 What is that?

4 A. It would be a custom order, a customer requesting a  
5 custom order under 5,000 pills.

6 Q. All right. What was your canned response?

7 A. Thank you for reaching out to us. We appreciate your  
8 interest in our product. We want to move our product as  
9 efficiently as possible. We are currently moving toward  
10 bulk heavier shipments. Because of this change we will only  
11 be creating custom listings for orders of 5-K plus going  
12 forward. Please let us know if you are interested in a bulk  
13 order.

14 Q. Who made the decision to not take custom orders for  
15 less than 5,000 pills?

16 A. Shamo.

17 Q. And he expressed that decision to you?

18 A. Correct.

19 Q. That is how you knew what to say?

20 A. Yeah.

21 Q. Is that true for most of these?

22 A. Yes.

23 Q. Let's talk about communicating with Mr. Shamo. Would  
24 you use Telegram?

25 A. Yes.

1 Q. Why Telegram?

2 A. I was told that it was an encrypted form of instant  
3 messaging.

4 Q. Who told you that?

5 A. Drew Crandall's girlfriend, Sasha Grant.

6 Q. Mr. Shamo also used Telegram?

7 A. Yes.

8 Q. Were you comfortable asking Mr. Shamo for direction and  
9 advice?

10 A. Uh-huh. Yes.

11 Q. I want to look through some of your communications with  
12 him.

13 A. Okay.

14 Q. This will be Exhibit 14.15. My thought in this is that  
15 maybe you and I can go through it by topic rather than  
16 chronologically.

17 A. Okay.

18 Q. We'll see if it falls flat. First let's talk about Tor  
19 and P.G.P., the first topic. Look at page 3, I think, right  
20 at the bottom.

21 You have had a chance to look at this before, right?

22 A. Yes.

23 Q. On these boxes where it says at the bottom A.S., that  
24 is from Mr. Shamo, right?

25 A. Yes.

1 Q. The other colored boxes, those are from you?

2 A. Yes.

3 Q. This bottom message from him, could you read that out  
4 loud?

5 A. K, I'm gonna for sure get your account up tonight.  
6 Make sure to download the Tor browser.

7 Q. Did you know what Tor was prior to making this  
8 arrangement with Mr. Shamo?

9 A. I did not.

10 Q. Did he teach you about it?

11 A. He did.

12 Q. If we could go to page 4 and we're going to look at  
13 P.G.P. for U.S.B. Up there at the top, do you see that  
14 first handful of messages?

15 A. Yes.

16 Q. What is it you're asking in that first question? Go  
17 ahead and read it.

18 A. Yep. And G.P.G. and what was the name of the e-mail  
19 thing?

20 Q. And then his response?

21 A. G.P.G. for U.S.B.

22 Q. What is that?

23 A. I don't remember.

24 Q. Could it have a program you used to decrypt?

25 A. It could have.

1 Q. Let's go to the bottom now of page 4. He is going to  
2 ask you a question above that. I am sorry. I should have  
3 warned you.

4 MR. GADD: Can we just zoom out here?

5 BY MR. GADD

6 Q. There is a correction there in his question, but do you  
7 understand what he is communicating?

8 A. Yes. He wanted to know what I decided on my name.

9 Q. That is when you made a decision?

10 A. Correct.

11 Q. And you told him?

12 A. Yes.

13 Q. Do you recall your first sale?

14 A. Yeah.

15 Q. Were you able to decrypt the message coming in on your  
16 first sale?

17 A. The first sale for my account?

18 Q. For your account, Dr. Wario.

19 A. Yes.

20 Q. At some point you needed Mr. Shamo's private key in  
21 order to decrypt, right?

22 A. Not from the ones that were coming on my account.

23 Q. Maybe that is the distinction. Let's look at page 36.  
24 Right there in the middle starting with yo, can you read  
25 your question to him?

1 A. Yo, I think because the sales were on your account with  
2 your public key I can't decrypt people's public keys to  
3 process orders. Do you know of a way to bypass that?

4 Q. Then you can skip the next line. Read the bottom one  
5 there.

6 A. I will have to give you my private key and pass.

7 Q. At some point you got his private key anyway to do his  
8 customer service, right?

9 A. Correct.

10 Q. Let's talk about his keys for a moment.

11 MR. GADD: Can we look at page 45?

12 BY MR. GADD

13 Q. So you go through several pages where you're trying to  
14 troubleshoot and you're trying to figure out decrypting,  
15 right? It looks like maybe you don't have the right key,  
16 correct?

17 A. Correct.

18 Q. You are going to ask a couple of questions to him here.  
19 The bottom three, if we could look at those, and can you  
20 read your top kind of response to him?

21 A. Yeah. I think I want a key at master4life.com.

22 Q. And then next?

23 A. Haveoneathome.com.

24 Q. When you say you want or you have, you are referring  
25 not to your keys but Mr. Shamo's keys, correct?

1 A. Correct.

2 Q. You're just trying to find the right one so that you  
3 can do your job?

4 A. Yes.

5 Q. How did you know that you needed or wanted one at  
6 master4life.com?

7 A. I believe there was something with the key that I was  
8 trying to decrypt that had that in there.

9 Q. You were kind of trying to figure it out, the missing  
10 links sort of?

11 A. Sort of speak, yes.

12 Q. And then you said you had one that is athome.com. Is  
13 that kind of the same process, that you were able to use  
14 your program to figure out what you had?

15 A. Yes.

16 Q. And then you must have figured it out because of the  
17 bottom line, right?

18 A. That is what it looks like, yes.

19 Q. New topic. Let's now talk about sigaint, but I want to  
20 talk about it in terms of your Telegram messages with Mr.  
21 Shamo. Look at the bottom of page 8.

22 We're going to be in 14 and 15 for a while. Not too  
23 long, I promise.

24 A. Thank you.

25 Q. Sure. Page 8, if we could.

1 Bottom three -- that DRW-99, that is your sigaint,  
2 right?

3 A. Correct.

4 Q. You're telling him, right --

5 A. Yeah.

6 Q. -- and then you ask him a question in the middle box  
7 there, right?

8 A. Yes.

9 Q. What did you mean by are you able to access your S.I.  
10 e-mail?

11 A. The sigaint domain to e-mail.

12 Q. And what was his response?

13 A. Yeah. I'm on American Steam all day.

14 Q. A little ways further in -- you had a problem at one  
15 point while he was on vacation, right?

16 A. Yeah.

17 Q. You needed to communicate with the shippers?

18 A. Uh-huh.

19 Q. But your e-mails were not working?

20 A. Correct.

21 Q. Were you trying to get Mr. Shamo to troubleshoot it?

22 A. Yeah.

23 Q. From wherever he was on vacation?

24 A. Correct.

25 Q. Eventually you figure it out, right?

1           Page 62. Let's look at the top six or so. This first  
2 part there he is saying pass the pea, singular. He is just  
3 trying to troubleshoot for you, right?

4       A.    Correct.

5       Q.    He says try both, L.O.L.

6       A.    Yes.

7       Q.    Read the fourth box down there and feel free to  
8 abbreviate some of the words you think you should.

9       A.    Dude, I think we are all freaking dyslexic. The site  
10 is called sigaint. I thought it was giant. We have all  
11 been spelling it wrong. Hopefully that worked.

12      Q.    That was the problem, right?

13      A.    Correct.

14      Q.    Was this a common issue? Did you know other people  
15 that were having that problem where they were inverting the  
16 A and the I?

17      A.    I know I had a problem with it and that is why I only  
18 referred to it as the S.I., because I couldn't remember  
19 which way the rest of it was supposed to be.

20      Q.    Thank you. That was probably a bad question but a good  
21 answer. Thank you.

22            You were having trouble talking to the shippers. Did  
23 you later find out who the shippers were?

24      A.    I know who they are now.

25      Q.    You actually know the shippers, right?



1 A. I do.

2 Q. And knew them at the time?

3 A. I did.

4 Q. When you were at work how closely did you sit next to  
5 Ms. Bustin?

6 A. She sat directly to my left.

7 Q. Like right next to you?

8 A. Right next to me.

9 Q. Did you have any idea at that point that your night  
10 activities and her night activities were connected?

11 A. I did not. I saw that she had Telegram on her phone at  
12 one point.

13 Q. What did you say to her about that?

14 A. Hey, why do you have Telegram?

15 Q. What did she say?

16 A. Don't worry about it.

17 Q. Did you tell her you had Telegram?

18 A. I did not.

19 Q. New topic. Ready? Let's talk about Reddit Reviewer.

20 MR. GADD: Can we look at page 13?

21 BY MR. GADD

22 Q. Right at the top -- it will be much of it though. I  
23 guess we'll make it go in two parts.

24 What is it you're telling Mr. Shamo here in the first  
25 box?

1 A. Basically somebody wanted to get a free shipment so  
2 that they could try it out and then review it so that other  
3 people knew what they were getting themselves into.

4 Q. Did that happen with some frequency?

5 A. A couple of times.

6 Q. Did you have authority to make that decision?

7 A. I didn't feel like I did, no.

8 Q. So what did Mr. Shamo tell you there?

9 A. In this case he wanted to move forward with it.

10 Q. He gives you some direction in that third box, right?

11 A. Correct.

12 MR. GADD: If we could zoom out and look at the  
13 second half of it.

14 BY MR. GADD

15 Q. You looked into him, right?

16 A. I did.

17 Q. He seemed pretty legit to you?

18 A. He did.

19 Q. Let's talk for a minute now about Fentanyl.

20 MR. GADD: If we could look at the bottom of page  
21 14.

22 BY MR. GADD

23 Q. This is still in the time period where you're thinking  
24 you're going to set up your own store, right?

25 A. Yes.

1 Q. Let's look at the bottom communication he had with you,  
2 that bottom box. Do you remember him saying that to you or  
3 writing it to you?

4 A. Yeah.

5 Q. What did you think when he said I say we can make 10-K  
6 within two weeks?

7 A. That is a lot of money.

8 MR. GADD: Can we look at the top of 15?

9 BY MR. GADD

10 Q. That is good. Then we will keep going.

11 He gives you some instruction here, right?

12 A. Yes.

13 Q. Did he phrase that in the form of a question?

14 A. No.

15 Q. He told you?

16 A. Yeah.

17 MR. GADD: Then if we could zoom out, now we're  
18 going to read a few more of the messages here. We can go  
19 most of the way down, I think.

20 If there is anyone on the jury when we're doing this  
21 and you can't read it, just raise your hand and we'll do a  
22 better zoom.

23 BY MR. GADD

24 Q. The top row there, that is your response to his earlier  
25 assertion, correct?

1 A. Correct.

2 Q. And then in the next row you're asking him a question?

3 A. Uh-huh.

4 Q. What is it you asked him?

5 A. What is fent candy? I will have to do my research.

6 Q. Then did you explain why you were asking the question  
7 in the next row?

8 A. So that I could describe it in the listing, yeah.

9 Q. And then he answered your question, right?

10 A. Yes.

11 Q. What did he say?

12 A. He said it is Fentanyl.

13 Q. Did he say how much he had?

14 A. He said he has a ton of it.

15 Q. Did he encourage you to trust him?

16 A. Yeah.

17 Q. You needed to ask him some additional questions, right?

18 Look now at page 16. He is starting with take a pic of more  
19 candy, so the second one down, and if we could look at the  
20 box of Mr. Shamo's replies. Go down five or so.

21 Here is more direction from him, right?

22 A. Yes.

23 Q. And he says take a pic of more candy. What did you  
24 understand that to mean?

25 A. At the time I just had regular candy that I bought and

1 was taking pictures of.

2 Q. And he wanted more candy?

3 A. Uh-huh. Yes.

4 Q. And then the next row, 500 micrograms. Was that a  
5 response to your question, an earlier question?

6 A. Yes, describing it so that I knew what to put in the  
7 listing.

8 Q. Then he is going to tell you what price to charge,  
9 right?

10 A. Yeah.

11 Q. What does he mean I.D.K. ten per candy?

12 A. I don't know, ten per candy, so he is just ballparking.

13 Q. This is brand new, right?

14 A. Yes.

15 Q. Can we look at page 20? Mr. Shamo there, the third one  
16 down, what does he tell you there in the middle?

17 A. He says the Fentanyl candy will fly off the shelf,  
18 saying it will sell fast.

19 Q. And then the bottom one?

20 A. So we want to focus on that and the Xanax first.

21 Q. Did you know what Fentanyl was?

22 A. He had -- before I got involved in this, no, I had  
23 never even heard of it.

24 Q. Did he tell you what it was?

25 A. He said it had similar effects to heroin.

1 Q. Let's change topics now. Let's talk about the phrase  
2 finalize early. If we could look at page 23. The third  
3 from the bottom you're going to ask him a question, and  
4 could you read that question?

5 A. Do we F.E.?

6 Q. What does F.E. mean?

7 A. Finalize early.

8 Q. What is his response?

9 A. No, we allow escrow.

10 Q. From that response and from your work in customer  
11 service, did you get a sense for whether or not  
12 Pharma-Master would allow customers to finalize early?

13 A. Yes.

14 Q. But they could also use AlphaBay's escrow service,  
15 right?

16 A. Yes.

17 Q. Let's talk about kind of in a general sense Fentanyl,  
18 but also the names Oxycodone and Roxy and things like that.

19 MR. GADD: Can we look at the bottom of page 24?

20 BY MR. GADD

21 Q. You're still trying to set up your own site at this  
22 point, right?

23 A. Correct.

24 Q. Is that you responding to him here at the top box?

25 A. Yes, it is.

1 Q. And then what is his response down here at the bottom?

2 A. Do you want me to read it?

3 Q. Please.

4 A. I don't have M.D.M.A. crystal yet. I will have to  
5 order some soon and Valium soon so hold off on that too for  
6 another week, maybe less. I am working on getting  
7 Oxycontin, a ten milligram mold, and once I do, you can sell  
8 those on top of the other Roxies that I have. They go fast.

9 Q. At some point you're going to have to clarify with him  
10 the difference between a Fent Roxy and a Roxy, right?

11 A. Correct.

12 Q. Before we do that, did you know what M.D.M.A. was?

13 A. I did.

14 Q. What is another name for it?

15 A. Ecstasy.

16 Q. Now let's go and let's look at page 55, the third line  
17 from the bottom, if we could do that, and then look at the  
18 bottom three.

19 You have got a question here for him, right? Read that  
20 question out loud.

21 A. Hey, are Fent Roxies and Roxies -- I see -- different?  
22 Do they need to be separated different on the sheet I send  
23 the shippers?

24 Q. Now we have to lay a little foundation, right? This is  
25 not customer service?

1 A. No.

2 Q. It is order processing?

3 A. Correct.

4 Q. You would do that sometimes, right?

5 A. Yes.

6 Q. So in your question you say, hey, are Fent Roxies and  
7 Roxies, and then there is that dash, I see. Do you think  
8 that could have been like a fat finger, a mistype --

9 A. It could have been a typo.

10 Q. -- for maybe Oxy?

11 A. It is possible.

12 Q. Either way you asked him are they different. What is  
13 his response?

14 A. No, both are the same.

15 Q. And then below that?

16 A. Same price, just different.

17 Q. Let's look at page 79. It is the second full box, a  
18 question for you, and we'll go down maybe five to --  
19 perfect. That is great.

20 Could you read that top box?

21 A. Someone wants to know if they could shoot a full Roxy  
22 and how much Fent is in each one. Any insight?

23 Q. You didn't know the answers to those questions, right?

24 A. I did not.

25 Q. That is one that you clearly asked for assistance on?



1 A. Correct.

2 Q. What did he say? Can you read those?

3 A. Just say the effects equal a 30 milligram Roxy. Yeah,  
4 they can shoot a full one. They are a safe dose so no  
5 O.D.s. I said perfect.

6 Q. Did you ever talk to him about the quality of the drugs  
7 that he was selling? Did he ever express an opinion as to  
8 his quality?

9 A. Yeah. He said they were top-notch. Maybe not those  
10 words, but he made it seem like they were high quality.

11 Q. Something to that effect, equal perhaps to a  
12 prescription drug?

13 A. Correct.

14 Q. Let's look at pages 114 and 115. We better do that one  
15 at a time, now that I think about it.

16 You got a complaint here, right, the second from the  
17 bottom?

18 A. Yes.

19 Q. We'll look at those two and then we'll go down.

20 Can you read your question to Mr. Shamo?

21 A. Do you want the whole thing?

22 Q. Please. Yes.

23 A. Also, someone has complained about getting Roxies that  
24 were pressed when he ordered non-pressed, non-Fent Roxies.

25 Is that a thing? Should we re-ship?

1 Q. What is his response?

2 A. L.O.L. I only have pressed Fent.

3 Q. Now if we can go to the next page and then just the  
4 first one there.

5 A. It is clearly in the description.

6 Q. So there must have been somewhere other than like in  
7 the title of the listing where that information was  
8 contained?

9 A. Correct.

10 Q. Do you remember actually seeing it in a description  
11 somewhere?

12 A. In the description, yeah.

13 Q. How did your customer get confused? Do you know?

14 A. I don't.

15 Q. Any idea?

16 A. I mean, there was another listing that didn't have Fent  
17 in the title.

18 Q. So some listings had Fentanyl in the title and others  
19 don't?

20 A. Correct.

21 Q. Let's look at page 122. From time to time would you  
22 get complaints about the pills that your shipping team was  
23 sending out?

24 A. Yes.

25 Q. Would you flag those for Mr. Shamo?

1 A. Yes.

2 Q. If it was like an isolated, single complaint, would you  
3 flag it for him?

4 A. It got to a point where I sometimes would make a  
5 decision, like he told me just if it seems legit, to just  
6 re-ship it or refund, so sometimes I would make the  
7 decision.

8 Q. If you got several complaints in a row, is that  
9 something that you would raise to his attention?

10 A. Yeah.

11 Q. Let's look at the bottom four. Thank you.

12 Can you read your response to him and the question you  
13 asked in that top box?

14 A. Yo, lots of complaints about thin Roxies. Is that  
15 going to change?

16 Q. What did he say?

17 A. Yeah. Thin Roxies was very brief. The new ones are  
18 perfect.

19 Q. And then?

20 A. We're sending the perfect ones out now.

21 Q. With that information what do you do for your customers  
22 who are complaining?

23 A. I would offer them a reshipment.

24 Q. In your experience did most customers take you up on  
25 that?

1 A. Most of them.

2 Q. If it was not a reshipment would it be a refund?

3 A. It would.

4 Q. Did you have the ability to refund?

5 A. I did not.

6 MR. GADD: Could we look at page 134?

7 THE WITNESS: Can I go back to that last question?

8 BY MR. GADD

9 Q. Sure.

10 A. So initially when I had access I wasn't able to  
11 initiate a refund, but it got to the point where he wanted  
12 me to be more autonomous. I never pronounce that word  
13 right. He did give me access to the sales so I was able to  
14 process refunds towards the end.

15 Q. Thank you for clarifying.

16 We're here on page 134 now. I want to direct you to  
17 the very bottom box there.

18 A. Okay.

19 Q. Do you see that one? Do you remember asking him this  
20 question?

21 A. I do.

22 Q. Could you read that for the jury and, I should say, for  
23 the record?

24 A. Yes. Someone wants to pick up 1-K Roxies local.

25 Interested?

1 Q. And then if we could look at his response, which I  
2 think goes on to the next page. It is just that top box,  
3 right? Can you see that there?

4 A. Yeah.

5 Q. What was his response?

6 A. He told me to sticky the message.

7 Q. At some point did Mr. Shamo tell you about a local  
8 dealer?

9 A. He did.

10 Q. Someone he was giving Fentanyl pills to?

11 A. Correct.

12 MR. GADD: Could we look at page 146 at the  
13 bottom?

14 BY MR. GADD

15 Q. You have raised something to his attention here, right?

16 A. Correct.

17 Q. Could you read the top box?

18 A. Someone is saying Alpha is thinking about removing Fent  
19 being sold, says there is a threat about it. I will sticky  
20 it if you want to take a look.

21 Q. When you say in there someone is saying Alpha is  
22 thinking about -- what is Alpha?

23 A. AlphaBay, the marketplace.

24 Q. Put this maybe in your own words, but explain to the  
25 jury what this means. What does it mean?

1 A. Essentially it meant that his most like top selling  
2 product might be pulled, so it would impact profits.

3 MR. GADD: Could we look at 147 now?

4 BY MR. GADD

5 Q. His response is at the top, right?

6 A. Correct.

7 MR. GADD: Let's go maybe to the first six or so.

8 That is great.

9 BY MR. GADD

10 Q. This is his response, right? That is weird.

11 A. Correct.

12 Q. L.O.L.

13 And then he asks is it a Reddit article or just a  
14 rumor?

15 A. Uh-huh.

16 Q. What was your response?

17 A. It is a Reddit article.

18 Q. Did he indicate whether or not that was going to be  
19 good for him?

20 A. He did.

21 Q. At the bottom there?

22 A. Correct.

23 Q. Did he say it is not good for me?

24 A. He did.

25 Q. He didn't say it is not good for us, did he?

1 A. He did not.

2 Q. He didn't say it is not good for his boss, did he?

3 A. He did not.

4 MR. GADD: Could we look at page 150, the bottom  
5 two messages, if we could.

6 BY MR. GADD

7 Q. Is this another instance where you're getting some sort  
8 of customer service inquiry that you need to raise to Mr.  
9 Shamo's attention?

10 A. Yeah, it is.

11 Q. Could you read that top box for us?

12 A. Someone wants 10-K but wants to know what analogue is  
13 used. Also wants to know how much Fent and active  
14 ingredients.

15 Q. 10-K, that is 10,000 pills, right?

16 A. Correct.

17 Q. And then you asked the second question in the box  
18 there. What was your question to Mr. Shamo?

19 A. I asked him if he wanted me to hit them with the we  
20 don't talk about formula or if he wanted to respond to it.

21 MR. GADD: Then if we could zoom out, and then if  
22 we could just scroll down one page.

23 BY MR. GADD

24 Q. It is the very top one, his response, correct?

25 A. Yes.

1 Q. When he says sticky it, that means flag it for him,  
2 right?

3 A. Flag it so it will stick to the top so he does not have  
4 to search for the message.

5 Q. And then he indicates that he will take over from here?

6 A. Correct.

7 MR. GADD: Could we go to 154? If we could, let's  
8 look at the top seven or so. Maybe one more. That is  
9 great.

10 BY MR. GADD

11 Q. Can you tell us the date for these? We have not done  
12 much of that but let's do it here. What is the date on  
13 this?

14 A. The date is May 26, 2016.

15 Q. And you're going to ask him a question in these top two  
16 boxes, right?

17 A. Yes.

18 Q. Would you read that question?

19 A. Roxie just means replica Oxycodone, right?

20 Q. So you started in the spring, February and March,  
21 right?

22 A. Correct.

23 Q. It is now the end of May, and is this the first time  
24 you have had this question that you can remember?

25 A. It was the first time that I had to respond to it, so



1 yes.

2 Q. You're asking this not for your own benefit. You need  
3 to respond to someone, right?

4 A. Correct.

5 Q. When you say Roxie just means replica Oxycodone, right,  
6 what is his response?

7 A. Mine does, yeah.

8 Q. And then?

9 A. I only sell replica.

10 Q. But he did not quite answer the question you were  
11 asking, right?

12 A. Correct.

13 Q. So you're going to pose it a different way down here,  
14 right?

15 A. Yes.

16 Q. Read that one.

17 A. Yeah, but Roxies are an official drug, right? The R  
18 just means it is a replica?

19 Q. And then what is his response?

20 A. No. Roxie is a real drug made from real Oxycodone.

21 Q. And then his next line there?

22 A. Mine are made with a substitute.

23 Q. At the point you knew what the substitute was, right?

24 A. Correct.

25 Q. He had told you it was Fentanyl?

1 A. Yes.

2 Q. Let's change gears. We have been talking about  
3 Fentanyl and Roxy and Roxies. I now want to talk about a  
4 phrase called drops. Are you familiar with that phrase?

5 A. Yes, I am.

6 Q. I guess it is more of a term than a phrase.

7 MR. GADD: If we could look at page 38 and third  
8 from the bottom there.

9 BY MR. GADD

10 Q. He is giving you an excuse here and he indicates that  
11 he just got back picking stuff up from drops down south.  
12 Long day.

13 At that point did you know what he meant when he said  
14 drop or drops?

15 A. I don't remember.

16 Q. You know it now, though, right?

17 A. I do.

18 Q. What is a drop?

19 A. Essentially an address that he would use to send stuff  
20 so that it didn't come directly to him.

21 MR. GADD: Could we jump ahead now to 146?

22 BY MR. GADD

23 Q. Drops or maybe another term is package receivers?

24 A. Yes.

25 Q. They earned money for accepting packages, right?

1 A. They did.

2 Q. And you knew that?

3 A. I did.

4 Q. At one point did you talk to some friends of yours  
5 about becoming drops?

6 A. I did.

7 Q. Second there from the bottom, what is it you indicated  
8 here in the white box to him?

9 A. I had spoken to him about someone being a drop for him  
10 and I was telling him that I had the address if he wanted  
11 it.

12 Q. What did you stand to gain from giving him a drop?

13 A. I was going to split the proceeds with the drop.

14 Q. So if you got \$300 for a package, how would you split  
15 it?

16 A. 50-50.

17 Q. Your drops, the people you recruited, they knew that,  
18 right?

19 A. Correct.

20 Q. Mr. Shamo knew as well?

21 A. I don't remember.

22 Q. Okay.

23 MR. GADD: Scroll down. I think we're going to go  
24 to page 148, the top box there, and then we'll do maybe the  
25 first five or so.

1 BY MR. GADD

2 Q. Do you recognize the name in that top box?

3 A. I do.

4 Q. And the address?

5 A. Yes.

6 Q. Who is Jordan Bernal?

7 A. It is a friend of mine.

8 Q. Was he the drop that you had referenced?

9 A. He was.

10 Q. And you in fact explain that in the next communication,  
11 right?

12 A. Correct.

13 Q. That is what you mean when you say the drop?

14 A. Yes.

15 Q. And then what is it you ask him to do right after the  
16 drop?

17 A. I asked him to let me know when something was coming so  
18 I could tell the drop, Jordan.

19 Q. Was Mr. Shamo pleased?

20 A. Yes.

21 Q. That is what that next row means?

22 A. Yes.

23 Q. Then does he say I will have a couple sent A.S.A.P.?

24 A. Yes, he does.

25 Q. Then he expresses some love for you in the last one

1     there, right?

2     A.     That is what he says.

3     Q.     We might as well point it out. Jump to 17.06 so  
4     everyone can see. You'll see it on your screen but it is  
5     also on the chart. Once it is up on the screen, I am  
6     wondering if you can identify for the jury Mr. Bernal.

7     A.     He is on the bottom row fourth from the right.

8     Q.     That is him?

9     A.     Correct.

10    Q.     Part of your communications with Mr. Shamo now are not  
11    just about customer service, right? Part of it is managing  
12    your drops, correct?

13    A.     Right.

14                 MR. GADD: Jump back in and can we look at page  
15    172, right in the middle and all the way to the bottom?

16    BY MR. GADD

17    Q.     You have got a question here now at the top of the  
18    screen. Can you read that?

19    A.     Hey, do you know when that shipment is going to land at  
20    the drop I gave you?

21    Q.     You have a second question there about tracking,  
22    correct?

23    A.     Correct.

24    Q.     Because you have a couple hats you're wearing at this  
25    point, right?

1 A. Yes.

2 Q. And then he sends three responses in a row and the  
3 second response, so in the middle of his response he writes  
4 I'm sending a bunch to him.

5 Is that a reference to Mr. Bernal?

6 A. Yes.

7 Q. He should have five or six coming to him. Did you  
8 understand that to mean packages?

9 A. Yes.

10 MR. GADD: If we could look now at the next page,  
11 173.

12 BY MR. GADD

13 Q. You have got a response there at the top?

14 A. Yes.

15 MR. GADD: Could we go to the first four boxes  
16 there on the call out?

17 BY MR. GADD

18 Q. That is your response at the top, right?

19 A. Correct.

20 Q. What did you write to him?

21 A. Oh, don't overdo it.

22 Q. And then you want to clarify it in the next one, right?  
23 What did you ask him?

24 A. Is it 300 per package or --

25 Q. And his response is?

1 A. Yeah.

2 Q. Then to your statement about don't overdo it, did he  
3 respond here starting with they are?

4 A. Yes.

5 Q. Did he say they are coming from different sources, but  
6 I will slow it down. I will wait for the first two to land.  
7 They should be in the next week or two and continue after  
8 that?

9 A. Yes.

10 Q. Was that acceptable to you?

11 A. Yeah.

12 Q. What were you worried about with overdoing it?

13 A. I didn't want Jordan to get caught.

14 Q. The money is okay, it is just the risk?

15 A. Correct.

16 Q. Okay.

17 MR. GADD: Could we look at 193? Start right  
18 there in the middle starting with C.O.O. That is great.  
19 Those three are great.

20 BY MR. GADD

21 Q. You had one drop that was working and then can you read  
22 the message you sent to him there at the top?

23 A. I said I'm going to try to get another drop next week,  
24 too.

25 Q. And he is pleased with that, right?

1 A. He was.

2 Q. Again, he said that he loves you, dude, and then he  
3 told you three should be landing soon from your first drop,  
4 correct?

5 A. Yes.

6 Q. I think I will skip ahead on a lot of the drop stuff.  
7 Let's jump to where you indicate the name of your second  
8 drop and let's talk about page 242.

9 Do you see the bottom half of the screen where there is  
10 a name and an address?

11 A. Yes.

12 Q. Who is Kayla Bruner?

13 A. That is another friend of mine.

14 Q. Is this the second drop?

15 A. Yes.

16 Q. You're sending this to Mr. Shamo, correct?

17 A. Yes.

18 Q. At the bottom he is asking for a phone number, right?

19 A. Correct.

20 Q. You want to know -- you need a phone number? Did he  
21 explain to you that he needed a phone number sometimes for  
22 the shippers?

23 A. Correct.

24 Q. Meaning like the commercial carriers who send stuff,  
25 whether it is U.P.S., D.H.L. or some other shipper?



1 A. That is correct.

2 Q. Let's change gears. Let's talk about pressing.

3 Could we look at page 43? Starting there, the second  
4 from the bottom, Mr. Shamo wrote to you that I put in a  
5 12-hour -- today pressing and filling orders and getting  
6 stuff locally. This is March 15th, correct?

7 A. Yes.

8 Q. Did you know what he meant when he said pressing?

9 A. I knew that that meant like creating the pills, yeah.

10 Q. Did you ever see his pill press?

11 A. I did see one of them, yeah.

12 Q. Do you recall what it looked like?

13 A. Vaguely.

14 Q. Do you remember, was it in his Cottonwood Heights  
15 address?

16 A. It was.

17 Q. Do you remember whether it was upstairs or down?

18 A. Downstairs. Sorry, upstairs.

19 Q. Upstairs?

20 A. Upstairs.

21 Q. Was it not in the room with kind of the burgundy color  
22 on the wall?

23 A. I don't remember the color of the wall.

24 MR. GADD: Let's look at page 221, fourth from the  
25 bottom there. All the way to the bottom is fine.

1 BY MR. GADD

2 Q. Mr. Shamo wants to change your role up slightly,  
3 correct?

4 A. He did.

5 Q. Could you read what he wrote to you?

6 A. I might have a promotion for you for a month if you're  
7 interested. My pressing buddy might be leaving for a month  
8 or so. I can train you and pay you a lot if you are  
9 interested.

10 Q. Then he indicates how much a lot is?

11 A. Probably 5-K a week.

12 Q. Do you remember when he asked you this?

13 A. I do.

14 Q. What did you think?

15 A. 5-K a week is a lot, but I don't want to get so  
16 hands-on.

17 Q. When you say hands-on, to this point you're working at  
18 a keyboard, right?

19 A. Correct.

20 Q. You have not touched any of the Fentanyl?

21 A. Never.

22 Q. Or none of the Xanax that is being shipped out?

23 A. Never.

24 Q. So your response to him -- did you write, oh, boy?

25 Maybe I am using the wrong inflection there. Why don't

1 you read it.

2 A. Oh, boy. We'll have to talk about it. Can we meet  
3 Monday?

4 Q. And then he wants you to think about it and indicates  
5 that you'll have to get trained and things like that, right?

6 A. Correct.

7 Q. Your final decision on whether or not to press?

8 A. I declined it.

9 Q. How did he take it when you said no?

10 A. He asked again and made sure I was sure that I didn't  
11 want to and then said all right.

12 Q. Let's talk now about roles, meaning like positions.

13 MR. GADD: Could we look first at page 49, the top  
14 three boxes?

15 BY MR. GADD

16 Q. This is March 15th, 2016, correct?

17 A. Correct.

18 Q. At this point you're not full-time customer service,  
19 right?

20 A. Not yet.

21 Q. So he writes you're the man, Mario. I owe for this.  
22 Make me proud and you'll have a permanent spot.

23 Did you want a permanent spot?

24 A. At the time I did, yeah.

25 Q. What was it that you were going to do that would

1 potentially make him proud?

2 A. Just continue giving good customer service and getting  
3 good feedback for the shop.

4 MR. GADD: Let's look at page 68, the very top two  
5 or three boxes. Maybe the top two is fine.

6 BY MR. GADD

7 Q. You reached out to him to ask him a question, right?

8 A. Correct.

9 Q. Read your question to him.

10 A. Hey, man, I looked at your store last night and it said  
11 there was nothing listed. Maybe something was up with my  
12 browser, but everything is still going strong, right?

13 Q. This was not necessarily part of your customer service  
14 duties, right?

15 A. I believe I was logging in to do my job and I  
16 couldn't --

17 Q. Did you have any ability to fix it when the store was  
18 not looking right?

19 A. I did not.

20 Q. Who had that ability?

21 A. Shamo.

22 Q. Why were you looking out for his well-being?

23 A. At the time I kind of looked at it like we were a team.

24 MR. GADD: Let's look, if we could, at page 69  
25 over on the same topic of roles and positions.

1 BY MR. GADD

2 Q. Right in the middle starting with I only have access,  
3 you're explaining to him why you can't do something that he  
4 needs, right?

5 A. Correct.

6 Q. What is it you wrote to him there?

7 A. I said I only have access to see your messages and  
8 sales. I can't view anything else as you.

9 Q. That is because you were going through your account in  
10 that shared access mode, right?

11 A. Correct.

12 Q. Your relationship with Mr. Shamo as an employer, was it  
13 rocky at times?

14 A. Sometimes.

15 Q. But sometimes good?

16 A. Yeah.

17 Q. Did you have times when you fell behind in your duties?

18 A. I did.

19 Q. Let's look at one of those. Let's look at page 72.

20 The top box from Mr. Shamo, so the second full one down, and  
21 then we can look at the next one if you want to to give it  
22 context. That is good for now.

23 This is Mr. Shamo reaching out to you, right?

24 A. Correct.

25 Q. What does he say? There is a ton of messages that have

1     gone unanswered. I'll be helping you, but we need to get  
2     these taken care of.

3     A.    Correct.

4     Q.    Then you're trying to jump back in, right? You're  
5     trying to keep your job?

6     A.    Pretty much.

7     Q.    Let's look at page 77 for a minute. Right there in the  
8     middle, the largest of the messages, this is March of 2016,  
9     right?

10    A.    Correct.

11    Q.    And you're still trying to figure out how much you're  
12    going to get paid and when and things like that, right?

13    A.    Correct.

14    Q.    Did you propose a pay scale to Mr. Shamo?

15    A.    I did.

16    Q.    Could you read that for us?

17    A.    Hey, man, I was running the numbers and thinking about  
18    it last week on my way home. I was wondering if you would  
19    consider this pay scale? 75 for messages. It takes up the  
20    most time and takes the most effort looking up tracking and  
21    tailored responses, 25 for an hour and a half to under three  
22    hours, 75 for three hours plus. Let me know what you think.

23    Q.    By the end -- that is an unfair question.

24         By the summer of 2016 how much were you getting paid?

25    A.    I mean, it was hourly depending on how much time I was

1 spending. I don't remember exactly what the dollar amounts  
2 were.

3 Q. At some point you went to the flat rate, though, right?

4 A. Correct.

5 Q. Was that at the end?

6 A. Towards the end.

7 Q. How much was your flat rate?

8 A. I don't recall.

9 Q. You also had reduced hours at the end, right?

10 A. I did.

11 Q. Because he had hired someone else to help?

12 A. Correct.

13 Q. Let's look at page 152. In the fourth one down you're  
14 going to ask a question starting with do you want. You're  
15 trying to clarify about sending e-mails to the shippers,  
16 right?

17 A. Correct.

18 Q. That is why you said do you want me sending the e-mail  
19 every night?

20 A. Yes.

21 Q. This is when you are doing order processing?

22 A. Correct.

23 Q. What is Mr. Shamo's response?

24 A. He said the shipper is backed up so sending the e-mail  
25 tonight won't help, but if you want you can send it or I

1 will send it later.

2 Q. Did he say shipper singular or plural?

3 A. In this case he said singular.

4 Q. And then the next response or the continuation of Mr.  
5 Shamo's response, what did he say there?

6 A. That day with 200 orders really got him. L.O.L.

7 Q. Did he say him or her?

8 A. He said him.

9 Q. Or did he say them?

10 A. He said him.

11 Q. Him.

12 Do you know whether or not he protected your identity  
13 from the other people in the organization?

14 A. I don't think he did.

15 Q. He never told you who the shippers were, right?

16 A. Huh-uh.

17 MR. GADD: Can we look at pages 207 and 208?

18 Let's try that again. How about 207 to start?

19 BY MR. GADD

20 Q. Sometimes you were paid in Amazon codes, correct?

21 A. That is correct.

22 Q. That is what we see starting here at the bottom of the  
23 page, right?

24 A. Yes, it is.

25 MR. GADD: If we could go to the next page, Ms.



1     Lauder.

2     BY MR. GADD

3     Q.     That picture that is kind of split between the two  
4     pages, are those Amazon codes?

5     A.     Yes, they are.

6     Q.     And then the amount that he is giving to you?

7     A.     Yes.

8     Q.     He indicates that those are all codes for Amazon to  
9     you, right?

10    A.     Correct.

11    Q.     When he was not paying you in Amazon codes, how did he  
12    pay you?

13    A.     Cash.

14    Q.     Was it roughly every two weeks?

15    A.     It was.

16           MR. GADD:   Could we look at page 262?

17    BY MR. GADD

18    Q.     It is the last question on the idea of the various  
19    roles within the organization.   Right at the bottom Mr.  
20    Shamo is going to give you a response, the last one there.  
21    What does he say to you?

22    A.     He is saying that they are on vacation because the  
23    shippers were debating about leaving.

24    Q.     You also thought about leaving, correct?

25    A.     I did.

1 Q. Let's talk about that now. At one point you wanted to  
2 get out, right?

3 A. Correct.

4 Q. Why?

5 A. At the time we were getting a lot of messages about law  
6 enforcement heat and, I don't know, there was something  
7 weighing on my conscience every night that I logged in.  
8 That is part of the reason why some of the messages got  
9 backed up.

10 Q. At some point you as a customer service representative,  
11 you started getting reports from customers about law  
12 enforcement letters, right?

13 A. That is correct.

14 Q. What does that mean?

15 A. It meant instead of getting the package they got a  
16 letter from the post office.

17 Q. And then they would complain to you?

18 A. Correct.

19 Q. Did that make you nervous --

20 A. Yes.

21 Q. -- that letters were going out?

22 A. Yes.

23 MR. GADD: Could we look at page 183?

24 BY MR. GADD

25 Q. This is where you tell Mr. Shamo that you're ready to

1 get out, right?

2 A. Yes.

3 Q. If we could look at the biggest message there and kind  
4 of go all of the way through to the bottom.

5 Could you read what you wrote to him?

6 A. Yo, man, I think I want out. I wanted to say something  
7 sooner but I needed to think about it. It is all just so  
8 overwhelming right now. I think it would be a good idea to  
9 just cool it down for a month or two. I wanted to finish  
10 the week and hopefully have one last payday. I can even  
11 send you the templates I have set up for most of the  
12 responses. I hope that is cool.

13 Q. Did he respond, hey, Mario, I will always respect your  
14 decision? If it is getting to be too much work I can always  
15 hire another customer support member to help or I can raise  
16 your pay or I can even give you paid time off. If there is  
17 anything I can do to aid you to stay and not take a break,  
18 let me know?

19 A. He did.

20 Q. That is what he wrote.

21 Then you indicated thanks at the bottom, right?

22 A. Yes.

23 Q. You said you would think about it and then asked if he  
24 could meet on Sunday. Was that to talk in person?

25 A. Correct.

1 Q. You did stay, right, this time?

2 A. That is when we switched over to a flat rate.

3 Q. He mentioned in there maybe hiring another customer  
4 support member to help, right?

5 A. Correct.

6 Q. That happened at some point?

7 A. It did.

8 Q. Let's take just a minute and let's talk about that.

9 MR. GADD: If we could go to page 193, the last  
10 two at the bottom, if we could.

11 BY MR. GADD

12 Q. The date on here is?

13 A. June 30th.

14 Q. And Mr. Shamo is asking you a question, right?

15 A. Yes.

16 Q. He is checking up on you?

17 A. Correct.

18 Q. Does he say, hey, how are messages going? Looks like  
19 we are really backed up.

20 A. Yes, he did.

21 Q. And then did he say I will text my other customer rep  
22 guy to see if he had any other questions?

23 A. Correct.

24 Q. Was that about the time that he brought someone on to  
25 help?

1 A. Yes.

2 Q. In the next page or two you're going to get some  
3 questions about shared access and how it looks for you,  
4 correct?

5 A. Correct.

6 Q. Mr. Shamo needed to teach that to his other customer  
7 service rep, right?

8 A. He did, yeah.

9 Q. Did he ever tell you who it was?

10 A. He never did.

11 Q. Did you figure out who it was?

12 A. I have now. I asked him and he lied to me, so --

13 Q. You asked him?

14 A. I asked Shamo who the other person was and the person  
15 that I think it is, he told me it was not that person.

16 Q. We can just say it now because --

17 A. Drew Crandall.

18 Q. That is who you thought --

19 A. No, I didn't think it was because Shamo told me it  
20 wasn't him and I believed Shamo.

21 Q. Who did he tell you it was?

22 A. He never did.

23 Q. Let's look at page 196. At some point he asked you for  
24 templates, right?

25 A. Correct.

1 Q. What is what we had looked at, right, your kind of  
2 canned responses?

3 A. Correct.

4 Q. You needed to pass those over to the new guy, right?

5 A. Yes.

6 Q. So the bottom two there, does he say, also, for the  
7 e-mail templates did you use passthepeas P.G.P. or mine?  
8 Then he says can I get that again?

9 When you sent your canned responses over to him, did  
10 you encrypt it like you normally would encrypt it?

11 A. I did just for safety, yeah.

12 Q. Because he needs the key to unlock that, he is  
13 wondering which of the two P.G.P. keys you locked it with,  
14 right?

15 A. Correct.

16 Q. Can you tell us when you did actually take a break from  
17 the organization?

18 A. It was around September of 2016.

19 Q. Why did you stop?

20 A. Like I said, it was weighing on my conscience and I  
21 also had revealed it to my mom who I was living with at the  
22 time and she was not happy about it.

23 Q. That was her response?

24 A. Correct.

25 Q. Is that maybe putting it mildly?

1 A. Yes.

2 Q. So you stopped?

3 A. I did.

4 Q. Did you go back?

5 A. I did.

6 MR. GADD: Let's look at page 249. If we could  
7 look at the second one down and then we'll go all the way to  
8 the end.

9 BY MR. GADD

10 Q. What is the date on this?

11 A. September 17th, 2016.

12 Q. You reach out at the top and say hope the V.K. is going  
13 well, right?

14 A. Correct.

15 Q. Were you just keeping in contact at that point?

16 A. I am not sure. Was the previous message --

17 Q. We could zoom out if you want.

18 A. I am not sure. I assume it had to do with the previous  
19 message.

20 Q. That is okay. I can even withdraw that question if you  
21 want.

22 A. Sure.

23 Q. Mr. Shamo, in the third box down, does he say it is  
24 good, man? And then does he say want to come back, L.O.L.?

25 A. He does.

1 Q. What did you take want to come back to mean?

2 A. That he wanted me to work for him again.

3 Q. Then a couple of days later, the next box down, does he  
4 say, hey, you coming back at the end of the month or what is  
5 your play? Just trying to get an idea.

6 A. He does.

7 Q. What did you respond?

8 A. I'm hoping to move next week in which case, yeah.

9 Q. When you say I'm hoping to move, what did that mean?

10 A. I was moving out from my mother's house.

11 Q. You were going to get your own place?

12 A. Correct.

13 Q. Maybe I jumped the gun there. Read the next box for  
14 us.

15 A. Sure. So I just put money down on a place so I am like  
16 98 percent in at this point. Welcome back.

17 Q. His response is?

18 A. Yeah.

19 Q. Then he wants to use your drop again, right? That is  
20 the bottom one there?

21 A. Correct.

22 Q. Once you came back you had kind of a part-time role,  
23 right?

24 A. Correct.

25 Q. And a reduced amount of money was being paid to you?



1 A. Correct.

2 Q. Let's look now at order processing. Most of your work  
3 for him was customer service, right?

4 A. Correct.

5 Q. But you would process orders?

6 A. Every once in a while, yeah.

7 MR. GADD: Could we look at page 164?

8 BY MR. GADD

9 Q. Looking right in the middle, so he has got those three  
10 responses right in the middle, and I want to ask you about  
11 the second one. This is June of 2016, right?

12 A. Correct.

13 Q. Does he tell you the only thing is do not mark shipped  
14 to any Utah orders?

15 A. Yes, he does.

16 Q. Why? Do you know?

17 A. Not the details. I know he was working with somebody  
18 in Utah, but I didn't know --

19 Q. Was this kind of like a standing order or was it just  
20 like a one-time thing?

21 A. The way we handled Utah orders was constantly changing.

22 Q. Let's look at page 212. You mentioned it was  
23 constantly changing. Is that why you asked the question  
24 here in the middle?

25 A. Yes, it is.

1 MR. GADD: Go ahead and pull that out and let's  
2 read that in.

3 BY MR. GADD

4 Q. This is July of 2016, right?

5 A. Correct.

6 Q. What is it that you're asking Mr. Shamo here?

7 A. I asked him if we were still canceling any Utah orders.

8 Q. Utah or Salt Lake County?

9 A. Salt Lake County orders, yeah.

10 Q. There was mention in your communications with him of  
11 another state, not just Utah, right? Let's look for a  
12 minute at messages about Colorado.

13 MR. GADD: Could we look at page 203?

14 BY MR. GADD

15 Q. Right at the very bottom, do you see that one?

16 A. I do.

17 MR. GADD: Zoom in on the bottom one.

18 BY MR. GADD

19 Q. Can you read what Mr. Shamo told you?

20 A. He said also, I'm opening up a shipping department in  
21 Colorado so that will be good.

22 Q. Did it matter to you as customer service whether it  
23 shipped here or there?

24 A. Not at all.

25 MR. GADD: Could we look at page 239, the third

1 one down? If we could go maybe to the three boxes and let's  
2 start there. Yeah.

3 BY MR. GADD

4 Q. This is now the end of August of 2016, right?

5 A. Correct.

6 Q. When we zoom out we'll look at some above it for  
7 context, but can you read Mr. Shamo's first response there  
8 on the screen?

9 A. True. Once I get another shipping department in  
10 another state I will feel a lot better.

11 Q. And then did he say when that was going to happen?

12 A. He expected it in the next month or two.

13 MR. GADD: Can we zoom out?

14 BY MR. GADD

15 Q. His first comment there, the part about once I get  
16 another shipping department in another state I will feel a  
17 lot better, that was in response to the box just above it  
18 that you had written, correct?

19 A. Yes.

20 Q. Now what was it that you wrote that led him to say  
21 that?

22 A. It is close, man. It feels like things are smoothing  
23 out. People love us. L.O.L.

24 Q. Why did you say people love us?

25 A. We were getting a lot of really good feedback at the

1 time.

2 Q. Let's talk now about order processing and we'll jump  
3 out of this exhibit.

4 MR. GADD: Can we look at Exhibit 14.40?

5 I think I just gave you the wrong number. I  
6 apologize. It is 14.30. Yes. Thank you. Wrong number.

7 BY MR. GADD

8 Q. You can see that document on your screen, right?

9 A. Yes.

10 Q. What is it we're looking at here?

11 A. This was the day's orders for Xanax.

12 Q. This is a little before your time, right? What if we  
13 went to page 500? Did yours look about like this?

14 A. Yes.

15 MR. GADD: Let's take that second one in and if we  
16 could zoom in on that one for a second.

17 BY MR. GADD

18 Q. The top two rows, where did you get that information?

19 A. That was in the listing, the sale for the listing.

20 Q. Then the next two rows, where did you get that  
21 information?

22 A. The shipping information from the listing.

23 Q. And then the final part, the shipped to and then the  
24 name and the address, where did you get that?

25 A. That was left at the bottom of the notes for the sale.

1 That was usually decrypted.

2 Q. You didn't know this particular customer, right?

3 A. No.

4 Q. Connor Valentere. Do you know that name?

5 A. No.

6 Q. Is that just a name on a page?

7 A. Yes.

8 Q. Do you know if he was a real person?

9 A. I don't.

10 Q. Once this daily order sheet was created, is that what  
11 you could encrypt and then e-mail over to the shippers?

12 A. Yes.

13 MR. GADD: Can we look at page 2,305?

14 Sorry. I should have said 23.05, the exhibit.

15 BY MR. GADD

16 Q. There are a lot of pages to that one.

17 A. There is.

18 Q. Do you recognize this?

19 A. I do.

20 Q. This is the document that you signed when you pleaded  
21 guilty, right?

22 A. Correct.

23 MR. GADD: Could we zoom in on paragraph one?

24 Really that bottom half is fine.

25 BY MR. GADD

1 Q. Starting at paragraph one, it reads as part of this  
2 agreement with the United States I intend to plead guilty to  
3 counts two and three of the superseding indictment.

4 That is in fact what you pled guilty to, right?

5 A. That is correct.

6 Q. Count two was conspiracy to distribute Fentanyl,  
7 correct?

8 A. Correct.

9 Q. And count three was conspiracy to distribute  
10 Alprazolam?

11 A. Correct.

12 Q. You pled guilty as charged to every crime you were  
13 charged with, right?

14 A. I did.

15 Q. There were no counts dismissed or anything like that?

16 A. No.

17 Q. Did you want to plead guilty to every charge? That is  
18 probably a hard question.

19 A. Yeah, I did.

20 Q. Did you want to take full responsibility for your  
21 actions?

22 A. I did.

23 Q. Could we look now at the addendum at the end, the last  
24 two pages, if we could?

25 That is your signature, right?

1 A. Yes, it is.

2 Q. This is the addendum?

3 A. Correct.

4 Q. This is kind of like the deal between us, right?

5 A. Yeah.

6 Q. So if we could pick it up starting in the second  
7 paragraph, you agree to testify truthfully and completely  
8 for the United States in any subsequent court hearing or  
9 trial relating to this case if called upon, correct?

10 A. Correct.

11 Q. You also agree to wait to be sentenced until all the  
12 remaining defendants in the case have been sentenced,  
13 correct?

14 A. Correct.

15 Q. If you testify truthfully and completely the United  
16 States agreed that it would present your cooperation to the  
17 Court for the Court's consideration at sentencing, correct?

18 A. Correct.

19 Q. By that we mean to Judge Kimball, right?

20 A. Yes.

21 Q. You understand that not long from now you're going to  
22 be standing right here, correct?

23 A. Yes.

24 Q. And you're going to receive a sentence for your  
25 conviction, correct?

1 A. Yes.

2 Q. You understand that you could go to prison?

3 A. Yes.

4 Q. I left off there saying we're going to present it  
5 pursuant to a sentencing guideline there, that U.S.S.G.  
6 sentencing guideline 5K1.1?

7 A. Yeah.

8 Q. Is it your understanding that that removes any minimum  
9 mandatory sentence you might otherwise face?

10 A. It does.

11 Q. It does not change the maximum possible sentence, does  
12 it?

13 A. It does not.

14 Q. And then the United States also agrees to not charge  
15 the defendant with death resulting violations of -- and then  
16 if we zoom out it is going to be the code section.

17 A. Correct.

18 Q. Then go on to that next page. -- that may arise out of  
19 the continuing investigation into overdose deaths tied to  
20 the Pharma-Master drug sales.

21 That was your understanding, right?

22 A. Yes.

23 Q. There are no other promises between us?

24 A. No.

25 Q. No one has told you what your sentence might be yet?



1 A. No.

2 Q. There is no sentencing deal or recommendation?

3 A. No.

4 Q. Do you understand that when you're sentenced we are  
5 going to tell Judge Kimball everything that you did wrong?

6 A. Yeah.

7 Q. And what you did to try to make it right?

8 A. Yeah.

9 Q. It says here that you won't be charged with counts that  
10 may come up as part of the continuing investigation into  
11 deaths, but that does not mean that Judge Kimball won't know  
12 about it when you're sentenced, right?

13 A. True.

14 Q. It is relevant conduct. That is one of the terms in  
15 the agreement in fact, right?

16 A. Yes.

17 Q. He is going to know about all of it and he considers  
18 it. You understand that, right?

19 A. Yeah.

20 Q. You know that the sentence is 100 percent up to Judge  
21 Kimball?

22 A. I do.

23 Q. Just a last couple of questions.

24 You knew that the organization was selling Fentanyl  
25 just like in the sealed totes here, these blue pills,

1 Fentanyl, you knew that, right?

2 A. I did.

3 Q. Why did you help Aaron Shamo?

4 A. That year was something else just coming into it. I  
5 didn't have a lot of self-worth. I wanted to feel needed.  
6 I came from a low-income family that could barely make ends  
7 meet, so I wanted to make a little extra money. I was  
8 naive. I had no idea how dangerous this stuff actually was.  
9 I made one of the worst decisions I have ever made in my  
10 life and I regret it to this day.

11 Q. You met agents on November 22nd, 2016?

12 A. I did.

13 Q. They came to your work?

14 A. Yes.

15 Q. You were called up from the front desk, so to speak?

16 A. Yes.

17 Q. On your way there you deleted Telegram off your phone,  
18 right?

19 A. I did.

20 Q. What we have been looking at, that was recovered off of  
21 Mr. Shamo's phone, correct?

22 A. Yeah.

23 Q. But then you talked with the agents. Were you honest  
24 with them?

25 A. I was.

1 Q. Starting from that point, have you been honest with  
2 them since?

3 A. I have.

4 Q. Have you been honest today?

5 A. Yes.

6 MR. GADD: If I could have just a moment?

7 THE COURT: Yes.

8 BY MR. GADD

9 Q. When you met with those agents that first time --

10 A. I did.

11 Q. -- was there a deal between you and I or the United  
12 States and you?

13 A. No.

14 Q. But you were still honest?

15 A. I was.

16 Q. You still cooperated?

17 A. I did.

18 Q. Got online with them?

19 A. I did.

20 Q. Got them onto AlphaBay?

21 A. Yeah.

22 Q. Got them onto Pharma-Master?

23 A. Yeah. Copied and pasted listings for them. Yeah.

24 Q. Helped decrypt messages?

25 A. Yeah.

1 Q. Took screen shots with them?

2 A. Yeah.

3 Q. No deal?

4 A. None.

5 MR. GADD: No further questions.

6 THE COURT: Thank you.

7 How much time do you need for cross, do you think?

8 MR. SAM: Your Honor, I would guess about 20, 25  
9 minutes.

10 THE COURT: We have a calendar at 2:30. We  
11 promised the jurors we would be out before 2:30 each day.

12 You can come back, I assume, in the morning?

13 THE WITNESS: I can if I have to, yeah.

14 THE COURT: I know you don't want to.

15 We'll be in recess on this matter until 8:30 in  
16 the morning.

17 (WHEREUPON, the jury leaves the proceedings.)

18 (Proceedings adjourned.)  
19  
20  
21  
22  
23  
24  
25